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12 UNITED STATES DISTRICT COURT  
13 DISTRICT OF NEVADA  
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15 FEDERAL TRADE COMMISSION

16 Plaintiff,

17 v.

Civil Action No. 3:11-CV-00055-LRH

18 IMMIGRATION CENTER, a Colorado non-  
19 profit Corporation;

20 IMMIGRATION FORMS AND  
21 PUBLICATIONS, INC., a Missouri  
corporation;

22 CHARLES DOUCETTE, individually and  
23 d/b/a TELESTAFFING, IMMIGRATION  
FORMS AND SERVICES, and  
IMMIGRATION FORM PROCESSING;

24 DEBORAH STILSON a/k/a DEBORAH  
25 MALMSTROM, individually and d/b/a  
LIBERTY LEGAL SERVICES, AMERICAN  
26 LEGAL SERVICES, and NINNER;

27 ALFRED BOYCE, individually and d/b/a  
28 MAYDENE WEB SERVICES;

**STIPULATED ORDER OF  
PRELIMINARY INJUNCTION  
AND OTHER EQUITABLE  
RELIEF AS TO DEFENDANTS  
IMMIGRATION CENTER,  
CHARLES DOUCETTE,  
DEBORAH STILSON, AND  
ALFRED BOYCE**

1 THOMAS STRAWBRIDGE, individually  
2 and as an officer of IMMIGRATION FORMS  
AND PUBLICATIONS, INC.;

3 ROBIN MEREDITH, individually and as an  
4 officer of IMMIGRATION FORMS AND  
PUBLICATIONS, INC.;

5 THOMAS LAURENCE, individually; and

6 ELIZABETH MEREDITH, individually,

7 Defendants.  
8

9 Plaintiff, the Federal Trade Commission ("FTC"), pursuant to Sections 13(b) and 19 of the  
10 Federal Trade Commission Act ("FTC Act"), 15 U.S.C. §§ 53(b) and 57b, filed its Complaint for  
11 Injunctive and Other Equitable Relief, and an *Ex Parte* Application for Temporary Restraining  
12 Order with Asset Freeze, Appointment of a Receiver, Order Granting Immediate Access, Order  
13 Permitting Limited Expedited Discovery, and Order to Show Cause Why Preliminary Injunction  
14 Should Not Issue, and Supporting Memorandum ("Memorandum in Support of Motion for  
15 TRO"), pursuant to Rule 65 of the Federal Rules of Civil Procedure. On January 26, 2011, this  
16 Court granted Plaintiff's *Ex Parte* Motion for TRO and entered a Temporary Restraining Order  
17 ("TRO") with an Order to Show Cause Why a Preliminary Injunction Should Not Issue against  
18 Defendants Immigration Center, Immigration Forms and Publications, Inc., Charles Doucette,  
19 Deborah Stilson, Alfred Boyce, Thomas Strawbridge, Robin Meredith, Thomas Laurence, and  
20 Elizabeth Meredith (collectively referred to as "Defendants").

21 On February 10, 2011, this Court entered a preliminary injunction against Defendants  
22 Immigration Forms and Publications, Inc., Thomas Strawbridge, Robin Meredith, and Thomas  
23 Laurence. The Court extended the Temporary Restraining Order as to Defendants Immigration  
24 Center, Charles Doucette, Deborah Stilson, and Alfred Boyce until March 4, 2011.

### 25 DISPOSITION

26 Having duly considered the parties' pleadings, papers, and arguments, the Court hereby  
27 **GRANTS** the Stipulated Preliminary Injunction against Defendants Immigration Center, Charles  
28

1 Doucette, Deborah Stilson, and Alfred Boyce.

2 **FINDINGS**

3 1. This Court has jurisdiction over the subject matter of this case, and there is good  
4 cause to believe it has jurisdiction over the Defendants.

5 2. Venue lies properly with this Court.

6 3. This Court has the authority to grant a preliminary injunction and other  
7 appropriate relief pursuant to Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), and Rule 65 of  
8 the Federal Rules of Civil Procedure.

9 4. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), authorizes the issuance of such  
10 preliminary relief upon a proper showing that, weighing the equities and considering the FTC's  
11 likelihood of ultimate success, such action would be in the public interest.

12 5. Section 5(a) of the FTC Act prohibits deceptive acts and practices in or affecting  
13 commerce. To be deceptive, an act or practice must be one that is likely to mislead consumers  
14 acting reasonably under the circumstances, and is material. *FTC v. Stefanchik*, 559 F.3d 924, 928  
15 (9th Cir. 2009); *FTC v. Cyberspace.com, LLC*, 453 F.3d 1196, 1199-1200 (9th Cir. 2006).

16 6. The FTC alleged that Defendants Immigration Center, Charles Doucette, Deborah  
17 Stilson, and Alfred Boyce (collectively referred to as "Immigration Center Defendants") have  
18 engaged in, and are likely to engage in, acts and practices that violate Section 5(a) of the FTC  
19 Act, 15 U.S.C. § 45(a), and that the FTC is therefore likely to prevail on the merits of this action.

20 7. The FTC alleged that immediate and irreparable damage to the Court's ability to  
21 grant effective final relief for consumers in the form of monetary restitution will occur from the  
22 sale, transfer, or other disposition or concealment by Immigration Center Defendants of their  
23 assets or business records unless Immigration Center Defendants are immediately restrained and  
24 enjoined by Order of this Court.

25 8. Weighing the equities and considering the FTC's likelihood of ultimate success  
26 on the merits, a preliminary injunction with an asset freeze over all Immigration Center  
27 Defendants and appointment of a temporary receiver over Immigration Center and any other  
28 incorporated or unincorporated business through which any Individual Immigration Center

1 Defendant offers immigration and naturalization services, is in the public interest.

2 9. There is good cause for issuing this preliminary injunction pursuant to Rule 65 of  
3 the Federal Rules of Civil Procedure.

4 10. No security is required of any agency of the United States for the issuance of a  
5 preliminary injunction. Fed. R. Civ. P. 65(c).

6 11. This Order does not constitute, and shall not be interpreted to constitute, either an  
7 admission by Immigration Center Defendants of any of the FTC's allegations, or a finding by the  
8 Court that Immigration Center Defendants have engaged in any violations of the FTC Act or any  
9 other laws.

## 10 DEFINITIONS

11 For purposes of this Order, the following definitions shall apply:

12 1. **"Asset" or "Assets"** means any legal or equitable interest in, right to, or claim to,  
13 any real or personal property, including, but not limited to, "goods," "instruments," "equipment,"  
14 "fixtures," "general intangibles," "inventory," "checks," or "notes" (as these terms are defined in  
15 the Uniform Commercial Code), lines of credit, chattels, leaseholds, contracts, mail or other  
16 deliveries, shares of stock, lists of consumer names, accounts, credits, premises, receivables,  
17 funds, and all cash, wherever located.

18 2. **"Assisting others"** includes but is not limited to: (1) performing customer service  
19 functions, including, but not limited to, receiving or responding to consumer complaints; (2)  
20 formulating or providing, or arranging for the formulation or provision of, any sales script or  
21 other marketing material; (3) providing names of, or assisting in the generation of, potential  
22 customers; (4) performing or providing marketing or billing services of any kind; (5) acting as an  
23 officer or director of a business entity; or (6) providing telemarketing services.

24 3. **"Consumer" or "Customer"** means any person who purchased, agreed to  
25 purchase, or was charged for immigration and naturalization services from any Defendant prior  
26 to the date of this Order.

27 4. **"Defendants"** means all the Defendants named in this action including  
28 Immigration Center, Immigration Forms and Publications, Inc., Charles Doucette, Deborah

1 Stilson, Alfred Boyce, Thomas Strawbridge, Robin Meredith, Thomas Laurence, and Elizabeth  
2 Meredith, individually, collectively, or in any combination.

3 a. **“Individual Immigration Center Defendants”** refers to Charles  
4 Doucette, also d/b/a Telestaffing, Immigration Forms and Services and  
5 Immigration Form Processing; Deborah Stilson a/k/a Deborah Malmstrom,  
6 also d/b/a Liberty Legal Services, American Legal Services, and Ninner;  
7 and Alfred Boyce, also d/b/a Maydene Web Services; by whatever other  
8 names each may be known, individually, collectively, or in any  
9 combination; and

10 b. **“Immigration Center Defendants”** refers to all of the Individual  
11 Immigration Center Defendants and Defendant Immigration Center,  
12 individually, collectively, or in any combination.

13 5. **“Document” or “Documents”** means any materials listed in Federal Rule of Civil  
14 Procedure 34(a) and includes writings, drawings, graphs, charts, photographs, audio and video  
15 recordings, computer records, digital records, and other data compilations from which  
16 information can be obtained and translated, if necessary, into reasonably usable form through  
17 detection devices. A draft or nonidentical copy is a separate Document within the meaning of the  
18 term.

19 6. **“Financial Institution”** means any bank, savings and loan institution, credit  
20 union, or any financial depository of any kind, including, but not limited to, any brokerage house,  
21 trustee, broker-dealer, escrow agent, title company, commodity trading company, or precious  
22 metal dealer.

23 7. **“Immigration and naturalization services”** means any service provided to a  
24 person to aid or purporting to aid that person in any United States immigration or naturalization  
25 matter such as by: (a) appearing in any immigration case, either in person or through the  
26 preparation or filing of any brief or other document, paper, application, petition, or other form on  
27 behalf of another person before or with any branch of the United States Department of Homeland  
28 Security or the United States Department of Justice; (b) selecting or providing which visa, work

1 permit, temporary protective status, residency, citizenship, or other immigration status or benefit  
 2 to apply for, or which application or other form to use, or providing advice regarding these  
 3 selections; (c) advising a person regarding the requirements for obtaining a visa, a work permit,  
 4 temporary protective status, residency, citizenship, or any other immigration status or benefit; or  
 5 (d) advising a person regarding his or her answers on any immigration related document, paper,  
 6 application, petition, or other form.

7 8. **“Mail”** includes but is not limited to all envelopes, papers or other items  
 8 delivered, whether by United States Mail, United Parcel Service, Federal Express, Electronic  
 9 Mail, or similar delivery service.

10 9. **“Person”** means a natural person, an organization or other legal entity, including  
 11 a corporation, partnership, sole proprietorship, limited liability company, association,  
 12 cooperative, or any other group or combination acting as an entity.

13 10. **“Receiver”** means the temporary receiver appointed in this Order. The term  
 14 “receiver” also includes any deputy receivers as may be named by the temporary receiver.

15 11. **“Receivership Defendants”** refers to Immigration Center and each Individual  
 16 Defendant who operates any unincorporated business offering immigration and naturalization  
 17 services. Such Individual Defendants include but are not limited to Charles Doucette d/b/a  
 18 Telestaffing, Immigration Forms and Services, Immigration Form Processing, Maydene Media,  
 19 Liberty Legal Services, and American Legal Project; and Deborah Stilson, also known as  
 20 Deborah Malmstrom, d/b/a Liberty Legal Services, American Legal Services, Immigration  
 21 Forms, and Ninner as well as their successors, assigns, subsidiaries, and any fictitious business  
 22 entities or business names created or used by these entities, or any of them, that conduct any  
 23 business related to the Defendants’ immigration and naturalization services and which the  
 24 Receiver has reason to believe are owned or controlled in whole or in part by any of the  
 25 Defendants.

26 12. **“Receivership Property”** refers to any Assets, wherever located, that are (1)  
 27 owned, controlled, or held, in whole or in part, by, for the benefit of, or subject to access by, or  
 28 belonging to, any Receivership Defendant; (2) in the actual or constructive possession of any

Receivership Defendant; (3) held by an agent of any Receivership Defendant including as a retainer for the agent's provision of services to any of them; or (4) in the actual or constructive possession of, or owned, controlled, or held by, or subject to access by, any other individual, corporation, partnership, trust, or any other entity directly or indirectly owned, managed, or controlled by, or under common control with, any Receivership Defendant, including, but not limited to, any assets held by or for any Receivership Defendant in any account at any bank or savings and loan institution, or with any credit card processing agent, automated clearing house processor, network transaction processor, bank debit processing agent, customer service agent, commercial mail receiving agency, or mail holding or forwarding company, or any credit union, retirement fund custodian, money market or mutual fund, storage company, trustee, or with any broker-dealer, escrow agent, title company, commodity trading company, precious metal dealer, or other financial institution or depository of any kind, either within or outside the territorial United States. *Provided, however,* that Receivership Property shall not include property of the Individual Immigration Center Defendants not related to the marketing or sale of any immigration and naturalization service.

## CONDUCT PROHIBITIONS

### **I. Prohibitions Against Misrepresentations of Immigration and Naturalization Services**

**IT IS THEREFORE ORDERED** that, in connection with the advertising, marketing, promoting, offering for sale, sale, or provision of immigration and naturalization services, Immigration Center Defendants, and their officers, agents, servants, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division, or other device, or any of them, are hereby restrained and enjoined from misrepresenting, directly or indirectly, expressly or by implication, any material fact, including but not limited to:

A. That Defendants are authorized to provide immigration and naturalization services in the United States;

B. That Defendants are part of or affiliated with the United States Citizenship and



1 Immigration Services ("USCIS"), the United States Department of Homeland Security, or one or  
 2 more agencies of the United States government; and

3 C. That fees consumers pay to Defendants will cover costs associated with  
 4 submitting documents to the USCIS.

5 **II. Prohibition Against Providing Means and Instrumentalities to Deceive Consumers**  
 6 **Regarding Immigration and Naturalization Services**

7 **IT IS FURTHER ORDERED** that, in connection with the advertising, marketing,  
 8 promoting, offering for sale, or sale of immigration and naturalization services, Defendants  
 9 Charles Doucette and Deborah Stilson, and their officers, agents, servants, employees, and  
 10 attorneys, and all other persons in active concert or participation with any of them, who receive  
 11 actual notice of this Order by personal service or otherwise, whether acting directly or through  
 12 any trust, corporation, subsidiary, division, or other device, or any of them, are hereby restrained  
 13 and enjoined from providing to others the means and instrumentalities with which to deceive  
 14 consumers as described in Paragraph I.

15 **III. Customer Information**

16 **IT IS FURTHER ORDERED** that Immigration Center Defendants, and their officers,  
 17 agents, servants, employees, and attorneys, and all other persons in active concert or participation  
 18 with any of them, who receive actual notice of this Order by personal service or otherwise, are  
 19 hereby restrained and enjoined from:

20 A. Destroying or disposing of, any customer's documents in their possession,  
 21 custody, or control, including original documents and any briefs, applications, petitions or other  
 22 papers prepared or filed on the customer's behalf; and

23 B. Using, selling, renting, leasing, transferring, or otherwise disclosing or benefitting  
 24 from the name, address, birth date, telephone number, email address, Social Security number,  
 25 Social Insurance number, credit or debit card number, bank account number, or other financial or  
 26 identifying personal information of any person which was obtained by any Defendant prior to  
 27 entry of this Order in connection with the provision of immigration and naturalization services.

28 Provided, however, that Immigration Center Defendants may disclose such financial or



1 identifying personal information to a law enforcement agency or as required by any law,  
2 regulation, or court order.

#### 3 IV. Suspension of Websites

4 **IT IS FURTHER ORDERED** that Immigration Center Defendants and each of their  
5 successors, assigns, members, officers, agents, servants, employees, and those persons in active  
6 concert or participation with them who receive actual notice of this Order by personal service,  
7 facsimile transmission, email, or otherwise, whether acting directly or through any entity,  
8 corporation, subsidiary, division, affiliate, or other device, and any other person or entity served  
9 with a copy of this Order, shall:

10 A. Immediately do whatever is necessary to ensure that any Website used by  
11 Immigration Center Defendants for the advertising, marketing, promotion, offering for sale, sale,  
12 or provision of immigration and naturalization services, and containing statements or  
13 representations prohibited by Paragraph I of this Order, cannot be accessed by the public;

14 B. Prevent the destruction or erasure of any Website used by Immigration Center  
15 Defendants for the advertising, marketing, promotion, offering for sale, sale, or provision of  
16 immigration and naturalization services, and preserving all documents, webpages, or Websites in  
17 the format in which they are currently maintained; and

18 C. Immediately notify counsel for the FTC of any other Websites operated or  
19 controlled by Immigration Center Defendants.

#### 20 ASSET FREEZE AND DUTIES OF THIRD PARTIES

#### 21 V. Asset Freeze

22 **IT IS FURTHER ORDERED** that Immigration Center Defendants, and their officers,  
23 agents, servants, employees, and attorneys, and all other persons in active concert or participation  
24 with any of them, who receive actual notice of this Order by personal service or otherwise,  
25 whether acting directly or through any trust, corporation, subsidiary, division, or other device, or  
26 any of them, except as provided herein, as stipulated by the parties, or as directed by further order  
27 of the Court, are hereby restrained and enjoined from:

28 A. Transferring, liquidating, converting, encumbering, pledging, loaning, selling,

1 concealing, dissipating, disbursing, assigning, spending, withdrawing, granting a lien or security  
 2 interest or other interest in, or otherwise disposing of any funds, real or personal property,  
 3 accounts, contracts, shares of stock, lists of consumer names, or other assets, or any interest  
 4 therein, wherever located, including outside the territorial United States, that are:

- 5 1. owned, controlled, or held by, in whole or in part, for the benefit of, or  
 6 subject to access by, or belonging to, any Immigration Center Defendant;
- 7 2. in the actual or constructive possession of any Immigration Center  
 8 Defendant; or
- 9 3. in the actual or constructive possession of, or owned, controlled, or held  
 10 by, or subject to access by, or belonging to, any other corporation,  
 11 partnership, trust, or any other entity directly or indirectly owned,  
 12 managed, or controlled by, or under common control with, any  
 13 Immigration Center Defendant, including, but not limited to, any assets  
 14 held by or for any Immigration Center Defendant in any account at any  
 15 bank or savings and loan institution, or with any credit card processing  
 16 agent, automated clearing house processor, network transaction processor,  
 17 bank debit processing agent, customer service agent, commercial mail  
 18 receiving agency, or mail holding or forwarding company, or any credit  
 19 union, retirement fund custodian, money market or mutual fund, storage  
 20 company, trustee, or with any broker-dealer, escrow agent, title company,  
 21 commodity trading company, precious metal dealer, or other financial  
 22 institution or depository of any kind, either within or outside the territorial  
 23 United States;

24 B. Opening or causing to be opened any safe deposit boxes, commercial mail boxes,  
 25 or storage facilities titled in the name of any Immigration Center Defendant, or subject to access  
 26 by any Immigration Center Defendant or under any Immigration Center Defendant's control,  
 27 without providing the FTC prior notice and an opportunity to inspect the contents in order to  
 28 determine that they contain no assets covered by this Section;

C. Cashing any checks or depositing any payments from customers or clients of Defendants;

D. Incurring charges or cash advances on any credit card issued in the name, singly or jointly, of any Immigration Center Defendant; or

E. Incurring liens or encumbrances on real property, personal property, or other assets in the name, singly or jointly, of any Immigration Center Defendant or any corporation, partnership, or other entity directly or indirectly owned, managed, or controlled by any Immigration Center Defendant.

The funds, property, and assets affected by this Section shall include both existing assets and assets acquired after the effective date of this Order.

Notwithstanding the asset freeze provisions of Sections V.A-E above, Individual Immigration Center Defendants may, upon prior agreement with the FTC and compliance with Section VIII (Financial Statements and Accounting), *infra*, pay from their individual personal funds reasonable attorneys' fees and reasonable, usual, ordinary, and necessary living expenses.

## VI. Duties of Third Parties

**IT IS FURTHER ORDERED** that any financial institution, business entity, or person maintaining or having custody or control of any account or other asset of any Immigration Center Defendant, or any corporation, partnership, or other entity directly or indirectly owned, managed, or controlled by, or under common control with any Immigration Center Defendant, which is served with a copy of this Order, or otherwise has actual or constructive knowledge of this Order, shall:

A. Hold and retain within its control and prohibit the withdrawal, removal, assignment, transfer, pledge, hypothecation, encumbrance, disbursement, dissipation, conversion, sale, liquidation, or other disposal of any of the assets, funds, documents, or other property held by, or under its control:

1. on behalf of, or for the benefit of, any Immigration Center Defendant or any other party subject to Section V above;
2. in any account maintained in the name of, or for the benefit of, or subject

1 to withdrawal by, any Immigration Center Defendant or other party subject  
2 to Section V above; and

3 3. that are subject to access or use by, or under the signatory power of, any  
4 Immigration Center Defendant or other party subject to Section V above;

5 B. Deny Immigration Center Defendants access to any safe deposit boxes or storage  
6 facilities that are either:

7 1. titled in the name, individually or jointly, of any Immigration Center  
8 Defendant, or other party subject to Section V above; or

9 2. subject to access by any Immigration Center Defendant or other party  
10 subject to Section V above;

11 C. Provide the FTC, within five (5) days of the date of service of this Order, a sworn  
12 statement setting forth:

13 1. The identification number of each account or asset titled in the name,  
14 individually or jointly, of any Immigration Center Defendant, or held on  
15 behalf of, or for the benefit of, any Immigration Center Defendant or other  
16 party subject to Section V above, including all trust accounts managed on  
17 behalf of any Immigration Center Defendant or subject to any Immigration  
18 Center Defendant's control;

19 2. The balance of each such account, or a description of the nature and value  
20 of such asset;

21 3. The identification and location of any safe deposit box, commercial mail  
22 box, or storage facility that is either titled in the name, individually or  
23 jointly, of any Immigration Center Defendant, or is otherwise subject to  
24 access or control by any Immigration Center Defendant or other party  
25 subject to Section V above, whether in whole or in part; and

26 4. If the account, safe deposit box, storage facility, or other asset has been  
27 closed or removed, the date closed or removed and the balance on said  
28 date;

D. Allow representatives of the FTC immediate access to inspect and copy, or upon the FTC's request, within five (5) business days of said request, provide the FTC with copies of, all records or other documentation pertaining to each such account or asset, including, but not limited to, originals or copies of account applications, account statements, corporate resolutions, signature cards, checks, drafts, deposit tickets, transfers to and from the accounts, all other debit and credit instruments or slips, currency transaction reports, 1099 forms, and safe deposit box logs; and

E. This Section shall apply to existing accounts and assets, assets deposited or accounts opened on or after January 26, 2011, the effective date of the TRO entered in this matter, and any accounts or assets maintained, held or controlled at any time during the two years immediately prior to the effective date of the TRO. This Section shall not prohibit transfers in accordance with any provision of this Order, any further order of the Court, or by written agreement of the parties.

## VII. Repatriation of Assets and Documents

**IT IS FURTHER ORDERED** that Immigration Center Defendants shall:

A. To the extent they have not already done so, within three (3) business days following service of this Order, take such steps as are necessary to repatriate to the territory of the United States of America all Documents and Assets that are located outside such territory and are held by or for Immigration Center Defendants or are under Immigration Center Defendants' direct or indirect control, jointly, severally, or individually;

B. To the extent they have not already done so, within three (3) business days following service of this Order, provide the FTC with a full accounting of all Documents and Assets that are located outside of the territory of the United States of America or that have been transferred to the territory of the United States of America pursuant to Subsection A above and are held by or for any Immigration Center Defendant or are under any Immigration Center Defendant's direct or indirect control, jointly, severally, or individually, including the addresses and names of any foreign or domestic financial institution or other entity holding the Documents and Assets, along with the account numbers and balances;

1 C. Hold and retain all such Documents and Assets and prevent any transfer,  
2 disposition, or dissipation whatsoever of any such Documents or Assets; and

3 D. To the extent they have not already done so, within three (3) business days  
4 following service of this Order, provide the FTC access to Immigration Center Defendants'  
5 records and Documents held by Financial Institutions or other entities outside the territorial  
6 United States, by signing and delivering to Plaintiff's counsel the Consent to Release of Financial  
7 Records attached to this Order as Attachment A.

### 8 **RECORD KEEPING PROVISIONS**

#### 9 **VIII. Financial Statements and Accounting**

10 **IT IS FURTHER ORDERED** that, to the extent they have not already done so, within  
11 five (5) business days following the service of this Order:

12 A. Each Individual Immigration Center Defendant shall prepare and deliver to  
13 counsel for the FTC a completed financial statement on the form captioned "Financial Statement  
14 of Individual Defendant," which is attached to this Order as Attachment B.

15 B. Unless otherwise agreed upon with Counsel for the FTC and the Receiver,  
16 Immigration Center Defendants shall also prepare and deliver to Counsel for the FTC a  
17 completed financial statement on the form captioned "Financial Statement of Corporate  
18 Defendant," which is attached to this Order as Attachment C for Immigration Center and for each  
19 business entity owned, controlled or managed by the Individual Immigration Center Defendants,  
20 regardless of whether it is a defendant in this case. The financial statements shall be accurate as  
21 of the date and time of entry of the Preliminary Injunction; and

22 C. Each Immigration Center Defendant shall also prepare and deliver to Counsel for  
23 the FTC:

24 1. A completed statement, verified under oath:

25 a. specifying the name and address of each financial institution and  
26 brokerage firm at which the Immigration Center Defendant has  
27 accounts or safe deposit boxes. Said statements shall include  
28 assets held in foreign as well as domestic accounts; and

b. listing all persons who have received payments, transfers, or assignment of funds, assets, or property which total \$10,000 or more in any twelve-month period since January 1, 2009. This list shall specify: (a) the amount(s) transferred or assigned; (b) the name of each transferee or assignee; (c) the date of the assignment or transfer; and (d) the type and amount of consideration paid to the Immigration Center Defendant:

2. For each immigration and naturalization good or service advertised, marketed, promoted, offered for sale, or sold by any Immigration Center Defendant, a detailed accounting, verified under oath, of:

- a. all gross revenues obtained from the sale of each such good or service (broken down by month and year) from January 1, 2009, through the date of the service of the TRO;
- b. all net profits obtained from the sale of each such good or service (broken down by month and year) from January 1, 2009, through the date of the service of the TRO;
- c. the total amount of each such good or service sold (broken down by month and year) from January 1, 2009, through the date of the service of the TRO; and
- d. the full name, address, and telephone number of every purchaser or recipient of each such good or service, and the amount paid by each from January 1, 2009, through the date of the service of the TRO.

#### **IX. Records Maintenance and New Business Activity**

**IT IS FURTHER ORDERED** that Immigration Center Defendants, and their officers, agents, servants, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division, or other device, or



1 any of them, are hereby restrained and enjoined from:

2 A. Failing to create and maintain books, records, accounts, bank statements, current  
3 accountants' reports, general ledgers, general journals, cash receipt ledgers, cash disbursement  
4 ledgers and source documents, documents indicating title to real or personal property, and any  
5 other data which, in reasonable detail, accurately, fairly and completely reflect the incomes,  
6 disbursements, transactions, dispositions, and uses of the Immigration Center Defendants' assets;

7 B. Destroying, erasing, mutilating, concealing, altering, transferring, or otherwise  
8 disposing of, in any manner, directly or indirectly, any Documents, including electronically-  
9 stored materials, that relate in any way to the business practices or business or personal finances  
10 of Immigration Center Defendants; to the business practices or finances of entities directly or  
11 indirectly under the control of Immigration Center Defendants; or to the business practices or  
12 finances of entities directly or indirectly under common control with any other Defendant; and

13 C. Creating, operating, or exercising any control over any new business entity,  
14 whether newly formed or previously inactive, including any partnership, limited partnership,  
15 joint venture, sole proprietorship, or corporation, without first providing Plaintiff with a written  
16 statement disclosing: (1) the name of the business entity; (2) the address and telephone number of  
17 the business entity; (3) the names of the business entity's officers, directors, principals,  
18 managers, and employees; and (4) a detailed description of the business entity's intended  
19 activities.

## 20 RECEIVERSHIP PROVISIONS

### 21 X. Appointment of Receiver

22 **IT IS FURTHER ORDERED** that Aviva Gordon of Ellis & Gordon shall continue as  
23 Temporary Receiver for Receivership Defendants with the full power of an equity receiver. The  
24 Receiver shall be an agent of this Court in acting as a Receiver under this Order and shall be  
25 accountable directly to this Court. The Receiver shall comply with all Rules of this Court  
26 governing receivers. It is understood, given the nature of this assignment, that the Receiver may  
27 conclude that there are insufficient assets in the receivership or that other factors warrant  
28 withdrawal of the Receiver in accordance with Section XX of this Order.

**XI. Access to Receivership Defendants' Business Premises**

**IT IS FURTHER ORDERED** that the Receiver and her representatives and agents shall have immediate access to any business premises of the Receivership Defendants, and immediate access to any other location where any Receivership Defendant has conducted business or where property or business records are likely to be located. Such business premises locations specifically include, but are not limited to, the offices and facilities of one or more of the Receivership Defendants at 160 Hubbard Way, Reno, Nevada 89502 and 510 E. Plumb Lane, Ste. # B, Reno, Nevada 89502, and any storage facility that the Receiver learns is being used to store records or property of any Receivership Defendant.

A. The purpose of such access is to implement and carry out the Receiver's duties set forth in Section XII of this Order and to inspect and inventory all of the Receivership Property, including without limitation, assets and documents, and inspect and copy any documents relevant to this action. The Receiver and those specifically designated by her shall have the right to remove the above-listed documents from those premises in order that they may be inspected, inventoried, and copied;

B. In connection with gaining access to and securing the business premises of the Receivership Defendants, the Receiver is authorized to use the assistance of law enforcement officers as the Receiver deems necessary to effect service and to implement peacefully the provisions of this Order;

C. The Receiver shall allow the FTC's representatives, agents, and assistants, as well as Immigration Center Defendants and their representatives, reasonable access to the business premises of Receivership Defendants. The purpose of this access shall be to inspect and copy any and all books, records, accounts, and other property, including computer data, owned by or in the possession of the Receivership Defendants; and

D. The Receiver is authorized to provide continued access to any business premises of the Receivership Defendants to law enforcement officers, as she deems fit; and to refer to those law enforcement officers any documents or information that may appear to be relevant to her duties.

## XII. Receivership Duties

**IT IS FURTHER ORDERED** that the Receiver is directed and authorized to accomplish the following:

A. Assume full control of the relevant Receivership Defendants by removing, as the Receiver deems necessary or advisable, any Immigration Center Defendant or any director, officer, independent contractor, employee or agent of any Immigration Center Defendant from control or management of or participation in the affairs of the Receivership Defendants;

B. Take exclusive custody, control, and possession of all assets and documents of, or in the possession or custody or under the control of Receivership Defendants, wherever situated, including without limitation all paper documents and all electronic data and devices that contain or store electronic data including but not limited to computers, laptops, data storage devices, back-up tapes, DVDs, CDs, and thumb drives and all other external storage devices and, as to equipment in the possession or under the control of any Receivership Defendant, all PDAs, smart phones, cellular telephones, and similar devices issued or paid for by any Receivership Defendant. The Receiver shall be deemed to be the authorized responsible person to act on behalf of the Receivership Defendants and, subject to further order of the Court, shall have the full power and authority to take all corporate actions, including but not limited to, the filing of a petition for bankruptcy as the authorized responsible person as to the Receivership Defendants, dissolution of the Receivership Defendants, and sale of the Receivership Defendants. The Receiver shall have full power to divert mail and to sue for, collect, receive, take in possession, hold, and manage all assets and documents constituting Receivership Property and other persons or entities whose interests are now held by or under the direction, possession, custody or control of the Receivership Defendants; provided, however, that the Receiver shall seek further authority from the Court, after providing notice to the FTC, before attempting to collect any debt from a consumer if the Receiver believes the debt was induced by unfair or deceptive practices, including, without limitation, those identified by the FTC in this matter whether in the Complaint or in subsequent filings;

C. Take all steps necessary to secure the business premises of Receivership

1 Defendants including, but not limited to, all such premises located at 160 Hubbard Way, Reno,  
2 Nevada 89502; and 510 E. Plumb Lane, Ste. # B, Reno, Nevada 89502. Such steps may include,  
3 but are not limited to, the following as the Receiver deems necessary or advisable: (1) serving  
4 this Order on any person or entity; (2) completing a written inventory of receivership assets;  
5 (3) obtaining pertinent information from all employees and other agents of the Receivership  
6 Defendants including, but not limited to, the name, home address, social security number, job  
7 description, method of compensation, and all accrued and unpaid commissions and compensation  
8 of each such employee or agent; (4) video taping all portions of the business premises;  
9 (5) changing the locks and disconnecting any computer modems or other means of access to the  
10 computer or other records maintained at the business premises; (6) requiring any persons present  
11 on the business premises at the time this Order is served to leave the premises, to provide the  
12 Receiver with proof of identification, or to demonstrate to the satisfaction of the Receiver that  
13 such persons are not removing from the premises documents or assets of the Receivership  
14 Defendants; and (7) notwithstanding any other provision of this Order, the Receiver shall  
15 determine what constitutes reasonable access by other persons or entities to the business premises  
16 of the Receivership Defendants;

17 D. Investigate, conserve, hold, and manage all receivership assets, and perform all  
18 acts necessary or advisable to preserve the value of those assets in an effort to prevent any  
19 irreparable loss, damage or injury to consumers or to creditors of the Receivership Defendants  
20 including, but not limited to, obtaining an accounting of the assets, and preventing transfer,  
21 withdrawal or misapplication of assets;

22 E. Enter into contracts and purchase insurance as advisable or necessary;

23 F. Prevent the inequitable distribution of assets and determine, adjust, and protect the  
24 interests of consumers and creditors who have transacted business with Receivership Defendants;

25 G. Manage and administer the business of Receivership Defendants until further  
26 order of this Court by performing all incidental acts that the Receiver deems to be advisable or  
27 necessary, which include retaining, hiring, or dismissing any employees, independent contractors,  
28 or agents;

1 H. Choose, engage, and employ attorneys, accountants, appraisers, and other  
2 independent contractors and technical specialists (collectively, "Professionals"), as the Receiver  
3 deems advisable or necessary in the performance of duties and responsibilities under the  
4 authority granted by this Order, which Professionals shall apply for payment of fees and costs  
5 along with the Receiver and be paid from the assets of the receivership estate;

6 I. Make payments and disbursements from the receivership estate that are necessary  
7 or advisable for carrying out the directions of, or exercising the authority granted by, this Order;

8 J. Determine and implement the manner in which Receivership Defendants will  
9 comply with, and prevent violations of, this Order and all other applicable laws including, but not  
10 limited to, revising sales materials and implementing monitoring procedures;

11 K. Institute, compromise, adjust, defend, appear in, intervene in, or become party to  
12 such actions or proceedings in state, federal or foreign courts that the Receiver deems necessary  
13 and advisable to preserve or recover the assets of Receivership Defendants or that the Receiver  
14 deems necessary and advisable to carry out the Receiver's mandate under this Order, including,  
15 but not limited to, the filing of a petition for bankruptcy on behalf of any Receivership  
16 Defendant;

17 L. Defend, compromise, adjust or otherwise dispose of any or all actions or  
18 proceedings instituted in the past or in the future against the Receiver in her role as receiver, or  
19 against any Receivership Defendant that the Receiver deems necessary and advisable to preserve  
20 the assets of the Receivership Defendants, or that the Receiver deems necessary and advisable to  
21 carry out the Receiver's mandate under this Order, all notwithstanding the Stay of Actions set  
22 forth in Section XVII of this Order;

23 M. Continue and conduct the business of Receivership Defendants in such manner, to  
24 such extent, and for such duration as the Receiver may in good faith deem to be necessary and  
25 advisable to operate the business profitably and lawfully, if at all; provided, however, that the  
26 continuation and conduct of the business shall be conditioned upon the Receiver's good faith  
27 determination that the business can be lawfully operated at a net profit using the assets of the  
28 receivership estate and without resort to any unfair or deceptive practices including, without

1 limitation, those identified as such by the FTC in this matter whether in the Complaint or in  
 2 subsequent filings; and taking into account, among other things, that the fees and costs of the  
 3 Receiver and the Professionals must be paid as senior priority administrative expenses of the  
 4 receivership estate;

5 N. Conduct investigations and issue subpoenas to obtain documents and records  
 6 pertaining to, or in aid of, the receivership, and conduct discovery in this action on behalf of the  
 7 receivership estate;

8 O. Open one or more bank accounts in the District of Nevada as designated  
 9 depositories for funds of Receivership Defendants. The Receiver shall deposit all funds of the  
 10 Receivership Defendants in such a designated account and shall make all payments and  
 11 disbursements from the receivership estate from such an account;

12 P. Maintain accurate records of all receipts and expenditures that he or she makes as  
 13 Receiver;

14 Q. Cooperate with reasonable requests for information or assistance from any state or  
 15 federal law enforcement agency; and

16 R. Make periodic reports, observations and recommendations to this Court and seek  
 17 guidance and instructions from this Court if the Receiver deems necessary upon one day's  
 18 written or oral notice to all parties who filed an appearance in this proceeding.

### 19 **XIII. Cooperation With The Receiver**

20 **IT IS FURTHER ORDERED** that the Immigration Center Defendants and all other  
 21 persons or entities served with a copy of this Order shall fully cooperate with and assist the  
 22 Receiver. This cooperation and assistance shall include, but not be limited to, providing any  
 23 information to the Receiver that the Receiver deems necessary to exercising the authority and  
 24 discharging the responsibilities of the Receiver under this Order; providing any password  
 25 required to access any computer, electronic account, or digital file or telephonic data in any  
 26 medium; turning over all property, accounts, files, and records including those in possession or  
 27 control of attorneys or accountants; and advising all persons who owe money to Receivership  
 28 Defendants that all debts should be paid directly to the Receiver. Immigration Center Defendants



1 are hereby temporarily restrained and enjoined from directly or indirectly:

2 A. Transacting any of the business of Receivership Defendants;

3 B. Destroying, secreting, defacing, transferring, or otherwise altering or disposing of  
4 any documents of Receivership Defendants including, but not limited to, books, records,  
5 accounts, writings, drawings, graphs, charts, photographs, audio and video recordings, computer  
6 records, and other data compilations, electronically stored records, or any other papers of any  
7 kind or nature;

8 C. Transferring, receiving, altering, selling, encumbering, pledging, assigning,  
9 liquidating, or otherwise disposing of any assets owned, controlled, or in the possession or  
10 custody of, or in which an interest is held or claimed by, the Receivership Defendants or the  
11 Receiver;

12 D. Drawing on any existing line of credit available to Receivership Defendants;

13 E. Excusing debts owed to Receivership Defendants;

14 F. Failing to notify the Receiver of any asset, including accounts, of Receivership  
15 Defendants held in any name other than the name of a Receivership Defendant, or by any person  
16 or entity other than a Receivership Defendant, or failing to provide any assistance or information  
17 requested by the Receiver in connection with obtaining possession, custody or control of such  
18 assets;

19 G. Doing any act that would, or failing to do any act which failure would, interfere  
20 with the Receiver's taking custody, control, possession, or management of the assets or  
21 documents subject to this receivership; or harassing or interfering with the Receiver in any way;  
22 or interfering in any manner with the exclusive jurisdiction of this Court over the assets or  
23 documents of the Receivership Property; or refusing to cooperate with the Receiver or her duly  
24 authorized agents in the exercise of their duties or authority under any Order of this Court; and

25 H. Filing, or causing to be filed, any petition on behalf of any Receivership  
26 Defendant for relief under the United States Bankruptcy Code, 11 U.S.C. §§ 101-1330 (2002),  
27 without prior permission from this Court.  
28



**XIV. Delivery of Receivership Property**

**IT IS FURTHER ORDERED** that:

A. Immediately upon service of this Order upon them, or within such period as may be permitted by the Receiver, Receivership Defendants or any other person or entity shall transfer or deliver possession, custody, and control of the following to the Receiver:

1. All Receivership Property including, without limitation, bank accounts, Websites, buildings or office space owned, leased, rented, or otherwise occupied by the Receivership Defendants;
2. All documents of the Receivership Defendants and all documents related to the business activities of the Immigration Center Defendants, including, but not limited to, books and records of accounts, legal files (whether held by Immigration Center Defendants or their counsel), all financial and accounting records, balance sheets, income statements, bank records (including monthly statements, canceled checks, records of wire transfers, and check registers), client lists, title documents, and other papers;
3. All of Receivership Defendants' accounting records, tax records, and tax returns controlled by, or in the possession of, any bookkeeper, accountant, enrolled agent, licensed tax preparer or certified public accountant;
4. All loan applications made by or on behalf of Receivership Defendants and supporting documents held by any type of lender including, but not limited to, banks, savings and loans, thrifts or credit unions;
5. All assets belonging to members of the public now held by Receivership Defendants; and
6. All keys and codes necessary to gain or secure access to any assets or documents of Receivership Defendants including, but not limited to, access to their business premises, means of communication, accounts, computer systems or other property; and

B. In the event any person or entity fails to deliver or transfer any asset or otherwise fails to comply with any provision of this Paragraph, the Receiver may file *ex parte* an Affidavit of Non-Compliance regarding the failure. Upon filing of the affidavit, in addition to other remedies available to the Receiver, the Court may authorize, without additional process or demand, Writs of Possession or Sequestration or other equitable writs requested by the Receiver. The writs shall authorize and direct the United States Marshall or any sheriff or deputy sheriff of any county, or any other federal or state law enforcement officer, to seize the asset, document or other thing and to deliver it to the Receiver.

#### **XV. Transfer of Funds to the Receiver**

**IT IS FURTHER ORDERED** that, upon service of a copy of this Order, all banks, broker-dealers, savings and loans, escrow agents, title companies, leasing companies, landlords, ISOs, credit and debit card processing companies, insurance agents, insurance companies, commodity trading companies and all persons, including, without limitation, relatives, business associates or friends of the Immigration Center Defendants, or their subsidiaries or affiliates, holding assets of Receivership Defendants or in trust for the Receivership Defendants, shall cooperate with all reasonable requests of the Receiver relating to implementation of this Order, including freezing and transferring funds at her direction and producing records related to the assets of the Receivership Defendants.

#### **XVI. Collection of Receivership Defendants' Mail**

**IT IS FURTHER ORDERED** that:

A. All Immigration Center Defendants are hereby restrained and enjoined from opening mail addressed to the Receivership Defendants, including but not limited to such mail at the following addresses:

1. 160 Hubbard Way, Reno, Nevada 89502;
2. 510 E. Plumb Lane, Ste. # B, Reno, Nevada 89502;
3. 3495 Lakeside Dr., 218, Reno, Nevada 89509; and
4. Any address used by any of the Immigration Center Defendants related to the marketing or sale of any immigration and naturalization service;

1 B. The Receiver is authorized to open all such mail addressed to Receivership  
2 Defendants;

3 C. Any funds enclosed in any mail shall be maintained and accounted for by the  
4 Receiver until further order by the Court; and

5 D. Any Defendant who receives mail or any delivery addressed to a Receivership  
6 Defendant shall promptly deliver it unopened to the Receiver.

7 The Receiver shall forward unopened all mail that she receives on behalf of any  
8 Receivership Defendant, that is addressed solely to an Individual Immigration Center Defendant,  
9 to the Individual Immigration Center Defendant at his or her last known address.

10 **XVII. Stay of Actions**

11 **IT IS FURTHER ORDERED** that:

12 A. Except by leave of this Court, during pendency of the receivership ordered herein,  
13 Immigration Center Defendants and all other persons and entities aside from the Receiver are  
14 hereby stayed from taking any action to establish or enforce any claim, right, or interest for,  
15 against, on behalf of, in, or in the name of, the Receivership Defendants, any of their  
16 partnerships, assets, documents, or the Receiver or the Receiver's duly authorized agents acting  
17 in their capacities as such, including, but not limited to, the following actions:

- 18 1. Commencing, prosecuting, continuing, entering, or enforcing any suit or  
19 proceeding, except that such actions may be filed to toll any applicable  
20 statute of limitations;
- 21 2. Accelerating the due date of any obligation or claimed obligation; filing or  
22 enforcing any lien; taking or attempting to take possession, custody or  
23 control of any asset; attempting to foreclose, forfeit, alter or terminate any  
24 interest in any asset, whether such acts are part of a judicial proceeding or  
25 are acts of self-help or otherwise;
- 26 3. Executing, issuing, serving or causing the execution, issuance or service  
27 of, any legal process including, but not limited to, attachments,  
28 garnishments, subpoenas, writs of replevin, writs of execution, or any

1 other form of process whether specified in this Order or not; and

- 2 4. Doing any act or thing whatsoever to interfere with the Receiver taking  
3 custody, control, possession, or management of the assets or documents  
4 subject to this receivership, or to harass or interfere with the Receiver in  
5 any way, or to interfere in any manner with the exclusive jurisdiction of  
6 this Court over the assets or documents of the Receivership Defendants;

7 B. This Order does not stay:

- 8 1. The commencement or continuation of a criminal action or proceeding;  
9 2. The commencement or continuation of an action or proceeding by a  
10 governmental unit, including without limitation the FTC, to enforce such  
11 governmental unit's police or regulatory power;  
12 3. The enforcement of a judgment, other than a money judgment, obtained in  
13 an action or proceeding by a governmental unit to enforce such  
14 governmental unit's police or regulatory power;  
15 4. The issuance to the Receivership Defendants of a notice of tax deficiency;  
16 and

17 C. Except as otherwise provided in this Order, all persons and entities in need of  
18 documentation from the Receiver shall in all instances first attempt to secure such information by  
19 submitting a formal written request to the Receiver, and, if such request has not been responded  
20 to within 30 days of receipt by the Receiver, any such person or entity may thereafter seek an  
21 Order of this Court with regard to the relief requested.

## 22 XVIII. Compensation of Receiver

23 **IT IS FURTHER ORDERED** that the Receiver and her Professionals and all personnel  
24 hired by the Receiver as herein authorized, including counsel to the Receiver and accountants,  
25 are entitled to reasonable compensation for the performance of duties pursuant to this Order and  
26 for the cost of actual out-of-pocket expenses incurred by them, which compensation shall be  
27 derived exclusively from the assets now held by, or in the possession or control of, or which may  
28 be received by, the Receivership Defendants or which are otherwise recovered by the Receiver.

1 Each Receiver and Professional shall file with the Court and serve on the parties statements on a  
2 monthly basis, which shall include a description of all services provided and expenses incurred,  
3 with the first such statement filed no later than 30 days after the date of this Order. If no  
4 objection to the fees and expenses in the statements is filed with the Court by any party within 14  
5 days of service of the statements, then the Receiver shall be authorized to pay such statements on  
6 an interim basis, with final approval thereof to be reserved until the closing of the case. The  
7 Receiver shall not increase the hourly rates used as the bases for such fee applications without  
8 prior approval of the Court.

#### 9 **XIX. Receiver's Bond/Liability**

10 **IT IS FURTHER ORDERED** that no bond shall be required in connection with the  
11 appointment of the Receiver. Except for an act of gross negligence, the Receiver and the  
12 Professionals shall not be liable for any loss or damage incurred by any of the Immigration  
13 Center Defendants, their officers, agents, servants, employees and attorneys or any other person,  
14 by reason of any act performed or omitted to be performed by the Receiver and the Professionals  
15 in connection with the discharge of her duties and responsibilities, including but not limited to  
16 their withdrawal from the case under Section XX.

#### 17 **XX. Withdrawal of Receiver**

18 **IT IS FURTHER ORDERED** that the Receiver and any Professional retained by the  
19 Receiver, including but not limited to her attorneys and accountants, be and are hereby  
20 authorized to withdraw from their respective appointments or representations and apply for  
21 payment of their professional fees and costs at any time after the date of this Order, for any  
22 reason in their sole and absolute discretion, by sending written notice seven (7) days prior to the  
23 date of the intended withdrawal to the Court and to the parties along with a written report  
24 reflecting the Receiver's work, findings, and recommendations, as well as an accounting for all  
25 funds and assets in possession or control of the Receiver. The Receiver and Professionals shall  
26 be relieved of all liabilities and responsibilities, and the Receiver shall be exonerated and the  
27 receivership deemed closed seven (7) days from the date of the mailing of such notice of  
28 withdrawal. The Court will retain jurisdiction to consider the fee applications, report, and

accounting submitted by the Receiver and the Professionals. The written notice shall include an interim report indicating the Receiver's actions and reflect the knowledge gained along with the fee applications of the Receiver and his or her Professionals. The report shall also contain the Receiver's recommendations, if any.

## **XXI. Expedited Discovery**

**IT IS FURTHER ORDERED** that pursuant to Federal Rules of Civil Procedure 30(a), 31(a), 34, and 45, and notwithstanding the provisions of Federal Rules of Civil Procedure 26(d) and (f), 30(a)(2)(A), and 31(a)(2)(A), Plaintiff is granted leave, at any time after entry of this Order to:

A. Take the deposition of any person or entity, whether or not a party, for the purpose of discovering the nature, location, status, and extent of the assets of Immigration Center Defendants, and Immigration Center Defendants' affiliates and subsidiaries; the nature and location of documents reflecting the business transactions of Immigration Center Defendants, and Immigration Center Defendants' affiliates and subsidiaries; the location of any premises where Immigration Center Defendants, directly or through any third party, conduct business operations; the Immigration Center Defendants' whereabouts; and/or the applicability of any evidentiary privileges to this action; and

B. Demand the production of documents from any person or entity, whether or not a party, relating to the nature, status, and extent of the assets of Immigration Center Defendants, and Immigration Center Defendants' affiliates and subsidiaries; the nature and location of documents reflecting the business transactions of Immigration Center Defendants, and Immigration Center Defendants' affiliates and subsidiaries; the location of any premises where Immigration Center Defendants, directly or through any third party, conduct business operations; the Immigration Center Defendants' whereabouts; and/or the applicability of any evidentiary privileges to this action.

Three (3) days notice shall be deemed sufficient for any such deposition, five (5) days notice shall be deemed sufficient for the production of any such documents, and twenty-four (24) hours notice shall be deemed sufficient for the production of any such documents that are



maintained or stored only as electronic data. The provisions of this Section shall apply both to parties to this case and to non-parties. The limitations and conditions set forth in Federal Rules of Civil Procedure 30(a)(2)(B) and 31(a)(2)(B) regarding subsequent depositions of an individual shall not apply to depositions taken pursuant to this Section. Any such depositions taken pursuant to this Section shall not be counted toward any limit on the number of depositions under the Federal Rules of Civil Procedure including those set forth in Federal Rules of Civil Procedure 30(a)(2)(A) and 31(a)(2)(A) or the Local Rules of Civil Procedure for the United States District Court for the District of Nevada. Service of discovery upon a party, taken pursuant to this Section, shall be sufficient if made through the means described in Section XXII of this Order.

#### **XXII. Service of this Order**

**IT IS FURTHER ORDERED** that copies of this Order may be distributed by U.S. first class mail, overnight delivery, facsimile, electronic mail, or personally, by agents or employees of the FTC, by agents or employees of the Receivers, by any law enforcement agency, or by private process server, upon any Person, Financial Institution, or other entity that may have possession or control of any property, property right, document, or asset of any Immigration Center Defendant, or that may be subject to any provision of this Order. Service upon any branch or office of any Financial Institution or entity shall effect service upon the entire financial institution or entity.

#### **XXIII. Distribution of Order by Defendants**

**IT IS FURTHER ORDERED** that Immigration Center Defendants shall immediately provide a copy of this Order to each of their corporations, subsidiaries, affiliates, divisions, directors, officers, agents, partners, successors, assigns, employees, attorneys, agents, representatives, sales entities, sales persons, telemarketers, independent contractors, and any other Persons in active concert or participation with them. Within five (5) calendar days following service of this Order by the FTC, each Immigration Center Defendant shall file with this Court and serve on the FTC, an affidavit identifying the names, titles, addresses, and telephone numbers of the persons and entities Immigration Center Defendants have served with a copy of this Order in compliance with this provision.



**XXIV. Consumer Reporting Agencies**

**IT IS FURTHER ORDERED** that, pursuant to Section 604 of the Fair Credit Reporting Act, 15 U.S.C. § 1681b, any consumer reporting agency may furnish a consumer or credit report concerning any Immigration Center Defendant to the FTC.

**XXV. Correspondence with and Notice to the FTC**

**IT IS FURTHER ORDERED** that for purposes of this Order, all correspondence and pleadings to the FTC shall be addressed to:

Miry Kim  
Federal Trade Commission  
915 Second Avenue, Suite 2896  
Seattle, WA 98174  
(206) 220-6350 [telephone]  
(206) 220-6366 [facsimile]  
[mkim@ftc.gov](mailto:mkim@ftc.gov)

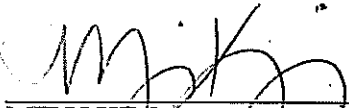
**XXVI. Retention of Jurisdiction**

**IT IS FURTHER ORDERED** that this Court shall retain jurisdiction of this matter for all purposes.

**SO STIPULATED AND AGREED:**

**PLAINTIFF:**

WILLARD K. TOM  
General Counsel  
ROBERT J. SCHROEDER  
Regional Director




MIRY KIM  
LAURA M. SOLIS  
Federal Trade Commission  
915 Second Ave., Suite 2896  
Seattle, WA 98174  
(206) 220-6350

Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION

Date: 3/1/11

1 DEFENDANTS:

2 

3 GARY M. PAKELE

4 Attorney at Law

432 Court Street

Reno, Nevada 89501

5 Attorney for Defendants CHARLES DOUCETTE  
6 and DEBORAH STILSON

Date: 3/1/11

7  
8 ALFRED BOYCE

9 Individually

Date: \_\_\_\_\_

10  
11  
12  
13 AVIVA GORDON

14 Ellis & Gordon

510 S. 9<sup>th</sup> St.

Las Vegas, NV 89101

(702) 385-3727

15 Receiver on behalf of Receivership Defendants

Date: \_\_\_\_\_

16  
17  
18  
19 SO ORDERED, this \_\_\_\_ day of \_\_\_\_\_, 2011.

20  
21 SEE LAST SIGNATURE PAGE

22 United States District Judge

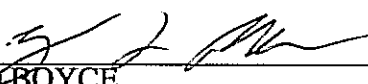
1 DEFENDANTS:

2  
3 GARY M. PAKELE  
4 Attorney at Law  
432 Court Street  
Reno, Nevada 89501  
5 Attorney for Defendants CHARLES DOUCETTE  
and DEBORAH STILSON  
6

Date: \_\_\_\_\_

7  
8 CHARLES DOUCETTE  
On Behalf of Defendant IMMIGRATION CENTER  
9

Date: \_\_\_\_\_

10   
11 ALFRED BOYCE  
Individually  
12

Date: Feb 26 2011

13 RECEIVER:

14  
15 AVIVA GORDON  
16 Ellis & Gordon  
510 S. 9<sup>th</sup> St.  
Las Vegas, NV 89101  
17 (702) 385-3727  
Temporary Receiver for Defendant Immigration  
18 Center  
19  
20

Date: \_\_\_\_\_

21 SO ORDERED, this \_\_\_\_ day of \_\_\_\_\_, 2011.  
22

23 SEE LAST SIGNATURE PAGE

24 United States District Judge  
25  
26  
27  
28

1 DEFENDANTS:

2  
3 GARY M. PAKELE  
4 Attorney at Law  
5 432 Court Street  
6 Reno, Nevada 89501  
7 Attorney for Defendants CHARLES DOUCETTE  
8 and DEBORAH STILSON  
9

Date: \_\_\_\_\_

10  
11  
12  
13 ALFRED BOYCE  
14 Individually  
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Date: \_\_\_\_\_

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AVIVA GORDON  
Ellis & Gordon  
510 S. 9<sup>th</sup> St.  
Las Vegas, NV 89101  
(702) 385-3727  
Receiver on behalf of Receivership Defendants

Date: \_\_\_\_\_

IT IS SO ORDERED.

DATED this 3rd day of March, 2011.



LARRY R. HICKS  
UNITED STATES DISTRICT JUDGE

**CONSENT TO RELEASE OF FINANCIAL RECORDS**

I, \_\_\_\_\_, do hereby direct any bank or trust company at which I have a bank account of any kind or at which a corporation has a bank account of any kind upon which I am authorized to draw, and its officers, employees and agents, to disclose all information and deliver copies of all documents of every nature in your possession or control which relate to the said bank accounts to any attorney of the Federal Trade Commission, and to give evidence relevant thereto, in the matter of *FTC v. Immigration Center, et al.*, now pending in the United States District Court for the District of Nevada at Reno, and this shall be irrevocable authority for so doing. This direction is intended to apply to the laws of countries other than the United States which restrict or prohibit the disclosure of bank information without the consent of the holder of the account, and shall be construed as consent with respect thereto, and the same shall apply to any of the bank accounts for which I may be the relevant principal.

Dated: \_\_\_\_\_, 2011      Signed: \_\_\_\_\_

FEDERAL TRADE COMMISSION

FINANCIAL STATEMENT OF INDIVIDUAL DEFENDANT

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**Instructions:**

1. Complete all items. Enter "None" or "N/A" ("Not Applicable") where appropriate. If you cannot fully answer a question, explain why.
2. "Dependents" include your live-in companion, dependent children, or any other person, whom you or your spouse (or your children's other parent) claimed or could have claimed as a dependent for tax purposes at any time during the past five years.
3. "Assets" and "Liabilities" include ALL assets and liabilities, located within the United States or elsewhere, whether held individually or jointly.
4. Attach continuation pages as needed. On the financial statement, state next to the Item number that the Item is being continued. On the continuation page(s), identify the Item number(s) being continued.
5. Type or print legibly.
6. Initial each page in the space provided in the lower right corner.
7. Sign and date the completed financial statement on the last page.

**Penalty for False Information:**

Federal law provides that any person may be imprisoned for not more than five years, fined, or both, if such person:

- (1) "in any matter within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies, conceals or covers up by any trick, scheme, or device a material fact, or makes any false, fictitious or fraudulent statements or representations, or makes or uses any false writing or document knowing the same to contain any false, fictitious or fraudulent statement or entry" (18 U.S.C. § 1001);
- (2) "in any . . . statement under penalty of perjury as permitted under section 1746 of title 28, United States Code, willfully subscribes as true any material matter which he does not believe to be true" (18 U.S.C. § 1621); or
- (3) "in any ( . . . statement under penalty of perjury as permitted under section 1746 of title 28, United States Code) in any proceeding before or ancillary to any court or grand jury of the United States knowingly makes any false material declaration or makes or uses any other information . . . knowing the same to contain any false material declaration" (18 U.S.C. § 1623).

For a felony conviction under the provisions cited above, federal law provides that the fine may be not more than the greater of (i) \$250,000 for an individual or \$500,000 for a corporation, or (ii) if the felony results in pecuniary gain to any person or pecuniary loss to any person other than the defendant, the greater of twice the gross gain or twice the gross loss. 18 U.S.C. § 3571.

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**BACKGROUND INFORMATION**

**Item 1. Information About You**

Your Full Name \_\_\_\_\_ Social Security No. \_\_\_\_\_

Place of Birth \_\_\_\_\_ Date of Birth \_\_\_\_\_ Drivers License No. \_\_\_\_\_

Current Address \_\_\_\_\_ From (Date) \_\_\_\_\_

Rent or Own? \_\_\_\_\_ Telephone No. \_\_\_\_\_ Facsimile No. \_\_\_\_\_

E-Mail Address \_\_\_\_\_ Internet Home Page \_\_\_\_\_

Previous Addresses for past five years:

Address \_\_\_\_\_ Rent or Own? \_\_\_\_\_ From/Until \_\_\_\_\_

Address \_\_\_\_\_ Rent or Own? \_\_\_\_\_ From/Until \_\_\_\_\_

Identify any other name(s) and/or social security number(s) you have used, and the time period(s) during which they were used \_\_\_\_\_

**Item 2. Information About Your Spouse or Live-In Companion**

Spouse/Companion's Name \_\_\_\_\_ Social Security No. \_\_\_\_\_

Place of Birth \_\_\_\_\_ Date of Birth \_\_\_\_\_

Identify any other name(s) and/or social security number(s) your spouse/companion has used, and the time period(s) during which they were used \_\_\_\_\_

Address (if different from yours) \_\_\_\_\_

From (Date) \_\_\_\_\_ Rent or Own? \_\_\_\_\_ Telephone No. \_\_\_\_\_

Employer's Name and Address \_\_\_\_\_

Job Title \_\_\_\_\_ Years in Present Job \_\_\_\_\_ Annual Gross Salary/Wages \$ \_\_\_\_\_

**Item 3. Information About Your Previous Spouse**

Previous Spouse's Name & Address \_\_\_\_\_

\_\_\_\_\_ Social Security No. \_\_\_\_\_ Date of Birth \_\_\_\_\_

**Item 4. Contact Information**



Name & Address of Nearest Living Relative or Friend \_\_\_\_\_  
 \_\_\_\_\_ Telephone No. \_\_\_\_\_

**Item 5. Information About Dependents Who Live With You**

►Name \_\_\_\_\_ Date of Birth \_\_\_\_\_  
 Relationship \_\_\_\_\_ Social Security No. \_\_\_\_\_  
 ►Name \_\_\_\_\_ Date of Birth \_\_\_\_\_  
 Relationship \_\_\_\_\_ Social Security No. \_\_\_\_\_  
 ►Name \_\_\_\_\_ Date of Birth \_\_\_\_\_  
 Relationship \_\_\_\_\_ Social Security No. \_\_\_\_\_

**Item 6. Information About Dependents Who Do Not Live With You**

►Name & Address \_\_\_\_\_  
 Date of Birth \_\_\_\_\_ Relationship \_\_\_\_\_ Social Security No. \_\_\_\_\_  
 ►Name Address \_\_\_\_\_  
 Date of Birth \_\_\_\_\_ Relationship \_\_\_\_\_ Social Security No. \_\_\_\_\_  
 ►Name & Address \_\_\_\_\_  
 Date of Birth \_\_\_\_\_ Relationship \_\_\_\_\_ Social Security No. \_\_\_\_\_

**Item 7. Employment Information**

Provide the following information for this year-to-date and for each of the previous five full years, for each company of which you were a director, officer, employee, agent, contractor, participant or consultant at any time during that period. "Income" includes, but is not limited to, any salary, commissions, draws, consulting fees, loans, loan payments, dividends, royalties or other benefits for which you did not pay (e.g., health insurance premiums, automobile lease or loan payments) received by you or anyone else on your behalf.

►Company Name & Address \_\_\_\_\_  
 Dates Employed: From (Month/Year) \_\_\_\_\_ To (Month/Year) \_\_\_\_\_  
 Positions Held with Beginning and Ending Dates \_\_\_\_\_  
 \_\_\_\_\_

**Item 7. continued**

Income Received: This year-to-date: \$ \_\_\_\_\_ : \$ \_\_\_\_\_  
 20\_\_\_\_ : \$ \_\_\_\_\_ : \$ \_\_\_\_\_  
 \_\_\_\_\_ : \$ \_\_\_\_\_ : \$ \_\_\_\_\_

►Company Name & Address \_\_\_\_\_

Dates Employed: From (Month/Year) \_\_\_\_\_ To (Month/Year) \_\_\_\_\_

Positions Held with Beginning and Ending Dates \_\_\_\_\_

Income Received: This year-to-date: \$ \_\_\_\_\_ : \$ \_\_\_\_\_  
 20\_\_\_\_ : \$ \_\_\_\_\_ : \$ \_\_\_\_\_  
 \_\_\_\_\_ : \$ \_\_\_\_\_ : \$ \_\_\_\_\_

►Company Name & Address \_\_\_\_\_

Dates Employed: From (Month/Year) \_\_\_\_\_ To (Month/Year) \_\_\_\_\_

Positions Held with Beginning and Ending Dates \_\_\_\_\_

Income Received: This year-to-date: \$ \_\_\_\_\_ : \$ \_\_\_\_\_  
 20\_\_\_\_ : \$ \_\_\_\_\_ : \$ \_\_\_\_\_  
 \_\_\_\_\_ : \$ \_\_\_\_\_ : \$ \_\_\_\_\_

**Item 8. Pending Lawsuits Filed by You or Your Spouse**

List all pending lawsuits that have been filed by you or your spouse in court or before an administrative agency. (List lawsuits that resulted in final judgments or settlements in Items 16 and 25).

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_

Docket No. \_\_\_\_\_ Relief Requested \_\_\_\_\_ Nature of Lawsuit \_\_\_\_\_

\_\_\_\_\_ Status \_\_\_\_\_

**Item 9. Pending Lawsuits Filed Against You or Your Spouse**

List all pending lawsuits that have been filed against you or your spouse in court or before an administrative agency. (List

lawsuits that resulted in final judgments or settlements in Items 16 and 25).

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_

Docket No. \_\_\_\_\_ Relief Requested \_\_\_\_\_ Nature of Lawsuit \_\_\_\_\_

\_\_\_\_\_ Status \_\_\_\_\_

**Item 10. Safe Deposit Boxes**

List all safe deposit boxes, located within the United States or elsewhere, held by you, your spouse, or any of your dependents, or held by others for the benefit of you, your spouse, or any of your dependents. *On a separate page, describe the contents of each box.*

<u>Owner's Name</u>	<u>Name &amp; Address of Depository Institution</u>	<u>Box No.</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

**Item 11. Business Interests**

List all businesses for which you, your spouse, or your dependents are an officer or director.

►Business' Name & Address \_\_\_\_\_

Business Format (*e.g.*, corporation) \_\_\_\_\_ Description of Business \_\_\_\_\_

\_\_\_\_\_ Position(s) Held, and By Whom \_\_\_\_\_

►Business' Name & Address \_\_\_\_\_

Business Format (*e.g.*, corporation) \_\_\_\_\_ Description of Business \_\_\_\_\_

\_\_\_\_\_ Position(s) Held, and By Whom \_\_\_\_\_

►Business' Name & Address \_\_\_\_\_

Business Format (*e.g.*, corporation) \_\_\_\_\_ Description of Business \_\_\_\_\_

\_\_\_\_\_ Position(s) Held, and By Whom \_\_\_\_\_

**FINANCIAL INFORMATION: ASSETS AND LIABILITIES**

**REMINDER: "Assets" and "Liabilities" include ALL assets and liabilities, located within the United States or elsewhere, whether held individually or jointly.**

**Item 12. Cash, Bank, and Money Market Accounts**

List cash and all bank and money market accounts, including but not limited to, checking accounts, savings accounts, and certificates of deposit, held by you, your spouse, or your dependents, or held by others for the benefit of you, your spouse, or your dependents. The term "cash" includes currency and uncashed checks.

Cash on Hand \$ \_\_\_\_\_ Cash Held For Your Benefit \$ \_\_\_\_\_

<u>Name on Account</u>	<u>Name &amp; Address of Financial Institution</u>	<u>Account No.</u>	<u>Current Balance</u>
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____

**Item 13. U.S. Government Securities**

List all U.S. Government securities, including but not limited to, savings bonds, treasury bills, and treasury notes, held by you, your spouse, or your dependents, or held by others for the benefit of you, your spouse, or your dependents.

<u>Name on Account</u>	<u>Type of Obligation</u>	<u>Security Amount</u>	<u>Maturity Date</u>
_____	_____	\$ _____	_____
_____	_____	\$ _____	_____
_____	_____	\$ _____	_____

**Item 14. Publicly Traded Securities and Loans Secured by Them**

List all publicly traded securities, including but not limited to, stocks, stock options, registered and bearer bonds, state and municipal bonds, and mutual funds, held by you, your spouse, or your dependents, or held by others for the benefit of you, your spouse, or your dependents.

► Issuer \_\_\_\_\_ Type of Security \_\_\_\_\_ No. of Units Owned \_\_\_\_\_

Name on Security \_\_\_\_\_ Current Fair Market Value \$ \_\_\_\_\_ Loan(s) Against Security \$ \_\_\_\_\_

Broker House, Address \_\_\_\_\_ Broker Account No. \_\_\_\_\_

► Issuer \_\_\_\_\_ Type of Security \_\_\_\_\_ No. of Units Owned \_\_\_\_\_

Name on Security \_\_\_\_\_ Current Fair Market Value \$ \_\_\_\_\_ Loan(s) Against Security \$ \_\_\_\_\_

Broker House, Address \_\_\_\_\_ Broker Account No. \_\_\_\_\_

#### **Item 15. Other Business Interests**

List all other business interests, including but not limited to, non-public corporations, subchapter-S corporations, limited liability corporations ("LLCs"), general or limited partnership interests, joint ventures, sole proprietorships, and oil and mineral leases, held by you, your spouse, or your dependents, or held by others for the benefit of you, your spouse, or your dependents.

► Business Format \_\_\_\_\_ Business' Name & Address \_\_\_\_\_

\_\_\_\_\_ Ownership % \_\_\_\_\_

Owner (e.g., self, spouse) \_\_\_\_\_ Current Fair Market Value \$ \_\_\_\_\_

► Business Format \_\_\_\_\_ Business' Name & Address \_\_\_\_\_

\_\_\_\_\_ Ownership % \_\_\_\_\_

Owner (e.g., self, spouse) \_\_\_\_\_ Current Fair Market Value \$ \_\_\_\_\_

#### **Item 16. Monetary Judgments or Settlements Owed to You, Your Spouse, or Your Dependents**

List all monetary judgments or settlements owed to you, your spouse, or your dependents.

► Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_ Docket No. \_\_\_\_\_

Nature of Lawsuit \_\_\_\_\_ Date of Judgment \_\_\_\_\_ Amount \$ \_\_\_\_\_

► Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_ Docket No. \_\_\_\_\_

Nature of Lawsuit \_\_\_\_\_ Date of Judgment \_\_\_\_\_ Amount \$ \_\_\_\_\_

#### **Item 17. Other Amounts Owed to You, Your Spouse, or Your Dependents**

List all other amounts owed to you, your spouse, or your dependents.

Debtor's Name, Address, & Telephone No. \_\_\_\_\_

Original Amount Owed \$ \_\_\_\_\_ Current Amount Owed \$ \_\_\_\_\_ Monthly Payment \$ \_\_\_\_\_

**Item 18. Life Insurance Policies**

List all life insurance policies held by you, your spouse, or your dependents.

►Insurance Company's Name, Address, & Telephone No. \_\_\_\_\_

Insured \_\_\_\_\_ Beneficiary \_\_\_\_\_ Face Value \$ \_\_\_\_\_

Policy No. \_\_\_\_\_ Loans Against Policy \$ \_\_\_\_\_ Surrender Value \$ \_\_\_\_\_

►Insurance Company's Name, Address, & Telephone No. \_\_\_\_\_

Insured \_\_\_\_\_ Beneficiary \_\_\_\_\_ Face Value \$ \_\_\_\_\_

Policy No. \_\_\_\_\_ Loans Against Policy \$ \_\_\_\_\_ Surrender Value \$ \_\_\_\_\_

**Item 19. Deferred Income Arrangements**

List all deferred income arrangements, including but not limited to, deferred annuities, pensions plans, profit-sharing plans, 401(k) plans, IRAs, Keoghs, and other retirement accounts, held by you, your spouse, or your dependents, or held by others for the benefit of you, your spouse, or your dependents.

►Name on Account \_\_\_\_\_ Type of Plan \_\_\_\_\_ Date Established \_\_\_\_\_

Trustee or Administrator's Name, Address & Telephone No. \_\_\_\_\_

Account No. \_\_\_\_\_ Surrender Value \$ \_\_\_\_\_

►Name on Account \_\_\_\_\_ Type of Plan \_\_\_\_\_ Date Established \_\_\_\_\_

Trustee or Administrator's Name, Address & Telephone No. \_\_\_\_\_

Account No. \_\_\_\_\_ Surrender Value \$ \_\_\_\_\_

**Item 20. Personal Property**

List all personal property, by category, whether held for personal use or for investment, including but not limited to,

furniture and household goods of value, computer equipment, electronics, coins, stamps, artwork, gemstones, jewelry, bullion, other collectibles, copyrights, patents, and other intellectual property, held by you, your spouse, or your dependents, or held by others for the benefit of you, your spouse, or your dependents.

<u>Property Category</u> (e.g., artwork, jewelry)	<u>Name of Owner</u>	<u>Property Location</u>	<u>Acquisition Cost</u>	<u>Current Value</u>
_____	_____	_____	\$ _____	\$ _____
_____	_____	_____	\$ _____	\$ _____
_____	_____	_____	\$ _____	\$ _____
_____	_____	_____	\$ _____	\$ _____
_____	_____	_____	\$ _____	\$ _____
_____	_____	_____	\$ _____	\$ _____

**Item 21. Cars, Trucks, Motorcycles, Boats, Airplanes, and Other Vehicles**

List all cars, trucks, motorcycles, boats, airplanes, and other vehicles owned or operated by you, your spouse, or your dependents, or held by others for the benefit of you, your spouse, or your dependents.

► Vehicle Type \_\_\_\_\_ Make \_\_\_\_\_ Model \_\_\_\_\_ Year \_\_\_\_\_

Registered Owner's Name \_\_\_\_\_ Registration State & No. \_\_\_\_\_

Address of Vehicle's Location \_\_\_\_\_

Purchase Price \$ \_\_\_\_\_ Current Value \$ \_\_\_\_\_ Account/Loan No. \_\_\_\_\_

Lender's Name and Address \_\_\_\_\_

Original Loan Amount \$ \_\_\_\_\_ Current Loan Balance \$ \_\_\_\_\_ Monthly Payment \$ \_\_\_\_\_

► Vehicle Type \_\_\_\_\_ Make \_\_\_\_\_ Model \_\_\_\_\_ Year \_\_\_\_\_

Registered Owner's Name \_\_\_\_\_ Registration State & No. \_\_\_\_\_

Address of Vehicle's Location \_\_\_\_\_

Purchase Price \$ \_\_\_\_\_ Current Value \$ \_\_\_\_\_ Account/Loan No. \_\_\_\_\_

Lender's Name and Address \_\_\_\_\_

Original Loan Amount \$ \_\_\_\_\_ Current Loan Balance \$ \_\_\_\_\_ Monthly Payment \$ \_\_\_\_\_

**Item 21. Continued**

► Vehicle Type \_\_\_\_\_ Make \_\_\_\_\_ Model \_\_\_\_\_ Year \_\_\_\_\_



Registered Owner's Name \_\_\_\_\_ Registration State &amp; No. \_\_\_\_\_

Address of Vehicle's Location \_\_\_\_\_

Purchase Price \$ \_\_\_\_\_ Current Value \$ \_\_\_\_\_ Account/Loan No. \_\_\_\_\_

Lender's Name and Address \_\_\_\_\_

Original Loan Amount \$ \_\_\_\_\_ Current Loan Balance \$ \_\_\_\_\_ Monthly Payment \$ \_\_\_\_\_

**Item 22. Real Property**

List all real estate held by you, your spouse, or your dependents, or held by others for the benefit of you, your spouse, or your dependents.

►Type of Property \_\_\_\_\_ Property's Location \_\_\_\_\_

Name(s) on Title and Ownership Percentages \_\_\_\_\_

Acquisition Date \_\_\_\_\_ Purchase Price \$ \_\_\_\_\_ Current Value \$ \_\_\_\_\_

Basis of Valuation \_\_\_\_\_ Loan or Account No. \_\_\_\_\_

Lender's Name and Address \_\_\_\_\_

Current Balance On First Mortgage \$ \_\_\_\_\_ Monthly Payment \$ \_\_\_\_\_

Other Loan(s) (describe) \_\_\_\_\_ Current Balance \$ \_\_\_\_\_

Monthly Payment \$ \_\_\_\_\_ Rental Unit? \_\_\_\_\_ Monthly Rent Received \$ \_\_\_\_\_

►Type of Property \_\_\_\_\_ Property's Location \_\_\_\_\_

Name(s) on Title and Ownership Percentages \_\_\_\_\_

Acquisition Date \_\_\_\_\_ Purchase Price \$ \_\_\_\_\_ Current Value \$ \_\_\_\_\_

Basis of Valuation \_\_\_\_\_ Loan or Account No. \_\_\_\_\_

Lender's Name and Address \_\_\_\_\_

Current Balance On First Mortgage \$ \_\_\_\_\_ Monthly Payment \$ \_\_\_\_\_

Other Loan(s) (describe) \_\_\_\_\_ Current Balance \$ \_\_\_\_\_

Monthly Payment \$ \_\_\_\_\_ Rental Unit? \_\_\_\_\_ Monthly Rent Received \$ \_\_\_\_\_

**Item 23. Credit Cards**

List each credit card held by you, your spouse, or your dependents. Also list any other credit cards that you, your spouse, or your dependents use.

<u>Name of Credit Card (e.g., Visa, MasterCard, Department Store)</u>	<u>Account No.</u>	<u>Name(s) on Account</u>	<u>Current Balance</u>	<u>Minimum Monthly Payment</u>
_____	_____	_____	\$ _____	\$ _____
_____	_____	_____	\$ _____	\$ _____
_____	_____	_____	\$ _____	\$ _____
_____	_____	_____	\$ _____	\$ _____
_____	_____	_____	\$ _____	\$ _____
_____	_____	_____	\$ _____	\$ _____

**Item 24. Taxes Payable**

List all taxes, such as income taxes or real estate taxes, owed by you, your spouse, or your dependants.

<u>Type of Tax</u>	<u>Amount Owed</u>	<u>Year Incurred</u>
_____	\$ _____	_____
_____	\$ _____	_____
_____	\$ _____	_____
_____	\$ _____	_____

**Item 25. Judgments or Settlements Owed**

List all judgments or settlements owed by you, your spouse, or your dependents.

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_ Docket No. \_\_\_\_\_

Nature of Lawsuit \_\_\_\_\_ Date \_\_\_\_\_ Amount \$ \_\_\_\_\_

**Item 26. Other Loans and Liabilities**

List all other loans or liabilities in your, your spouse's, or your dependents' names.

•Name & Address of Lender/Creditor \_\_\_\_\_

Nature of Liability \_\_\_\_\_ Name(s) on Liability \_\_\_\_\_

Date of Liability \_\_\_\_\_ Amount Borrowed \$ \_\_\_\_\_ Current Balance \$ \_\_\_\_\_

Payment Amount \$ \_\_\_\_\_ Frequency of Payment \_\_\_\_\_

•Name & Address of Lender/Creditor \_\_\_\_\_

Nature of Liability \_\_\_\_\_ Name(s) on Liability \_\_\_\_\_

Date of Liability \_\_\_\_\_ Amount Borrowed \$ \_\_\_\_\_ Current Balance \$ \_\_\_\_\_

Payment Amount \$ \_\_\_\_\_ Frequency of Payment \_\_\_\_\_

**OTHER FINANCIAL INFORMATION****Item 27. Tax Returns**

List all federal tax returns that were filed during the last three years by or on behalf of you, your spouse, or your dependents. *Provide a copy of each signed tax return that was filed during the last three years.*

<u>Tax Year</u>	<u>Name(s) on Return</u>	<u>Refund Expected</u>
_____	_____	\$ _____
_____	_____	\$ _____
_____	_____	\$ _____

**Item 28. Applications for Credit**

List all applications for bank loans or other extensions of credit that you, your spouse, or your dependents have submitted within the last two years. *Provide a copy of each application, including all attachments.*

<u>Name(s) on Application</u>	<u>Name &amp; Address of Lender</u>
_____	_____
_____	_____
_____	_____

**Item 29. Trusts and Escrows**

List all funds or other assets that are being held in trust or escrow by any person or entity for you, your spouse, or your dependents. Also list all funds or other assets that are being held in trust or escrow by you, your spouse, or your dependents, for any person or entity. *Provide copies of all executed trust documents.*

<u>Trustee or Escrow Agent's Name &amp; Address</u>	<u>Date Established</u>	<u>Grantor</u>	<u>Beneficiaries</u>	<u>Present Market Value of Assets</u>
				\$
				\$
				\$
				\$
				\$

**Item 30. Transfers of Assets**

List each person to whom you have transferred, in the aggregate, more than \$2,500 in funds or other assets during the previous three years by loan, gift, sale, or other transfer. For each such person, state the total amount transferred during that period.

<u>Transferee's Name, Address, &amp; Relationship</u>	<u>Property Transferred</u>	<u>Aggregate Value</u>	<u>Transfer Date</u>	<u>Type of Transfer (e.g., Loan, Gift)</u>
		\$		
		\$		
		\$		
		\$		
		\$		
		\$		
		\$		

SUMMARY FINANCIAL SCHEDULES**Item 31. Combined Balance Sheet for You, Your Spouse, and Your Dependents**

<u>ASSETS</u>		<u>LIABILITIES</u>	
Cash on Hand (Item 12)	\$ _____	Credit Cards (Item 23)	\$ _____
Cash in Financial Institutions (Item 12)	\$ _____	Motor Vehicles - Liens (Item 21)	\$ _____
U.S. Government Securities (Item 13)	\$ _____	Real Property - Encumbrances (Item 22)	\$ _____
Publicly Traded Securities (Item 14)	\$ _____	Loans Against Publicly Traded Securities (Item 14)	\$ _____
Other Business Interests (Item 15)	\$ _____	Taxes Payable (Item 24)	\$ _____
Judgments or Settlements Owed to You (Item 16)	\$ _____	Judgments or Settlements Owed (Item 25)	\$ _____
Other Amounts Owed to You (Item 17)	\$ _____	Other Loans and Liabilities (Item 26)	\$ _____
Surrender Value of Life Insurance (Item 18)	\$ _____	<u>Other Liabilities (Itemize)</u>	
Deferred Income Arrangements (Item 19)	\$ _____	_____	\$ _____
Personal Property (Item 20)	\$ _____	_____	\$ _____
Motor Vehicles (Item 21)	\$ _____	_____	\$ _____
Real Property (Item 22)	\$ _____	_____	\$ _____
<u>Other Assets (Itemize)</u>		_____	\$ _____
_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____
Total Assets	\$ _____	Total Liabilities	\$ _____

**Item 32. Combined Average Monthly Income and Expenses for You, Your Spouse, and Your Dependents for the Last 6 Months**

Provide the average monthly income and expenses for you, your spouse, and your dependents for the last 6 months. Do not include credit card payments separately; rather, include credit card expenditures in the appropriate categories.

<u>INCOME</u>		<u>EXPENSES</u>	
Salary - After Taxes	\$ _____	Mortgage Payments for Residence(s)	\$ _____
Fees, Commissions, and Royalties	\$ _____	Property Taxes for Residence(s)	\$ _____
Interest	\$ _____	Rental Property Expenses, Including Mortgage Payments, Taxes, and Insurance	\$ _____
Dividends and Capital Gains	\$ _____	Car or Other Vehicle Lease or Loan Payments	\$ _____
Gross Rental Income	\$ _____	Food Expenses	\$ _____
Profits from Sole Proprietorships	\$ _____	Clothing Expenses	\$ _____
Distributions from Partnerships, S-Corporations, and LLCs	\$ _____	Utilities	\$ _____
Distributions from Trusts and Estates	\$ _____	Medical Expenses, Including Insurance	\$ _____
Distributions from Deferred Income Arrangements	\$ _____	Other Insurance Premiums	\$ _____
Social Security Payments	\$ _____	Other Transportation Expenses	\$ _____
Alimony/Child Support Received	\$ _____	Other Household Expenses	\$ _____
Gambling Income	\$ _____	<u>Other Expenses (Itemize)</u>	
<u>Other Income (Itemize)</u>		_____	\$ _____
_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____
Total Income	\$ _____	Total Expenses	\$ _____

ATTACHMENTS**Item 33. Documents Attached to this Financial Statement**

List all documents that are being submitted with this financial statement.

<u>Item No. Document Relates To</u>	<u>Description of Document</u>

I am submitting this financial statement with the understanding that it may affect action by the Federal Trade Commission or a federal court. I have used my best efforts to obtain the information requested in this statement. The responses I have provided to the items above are true and contain all the requested facts and information of which I have notice or knowledge. I have provided all requested documents in my custody, possession, or control. I know of the penalties for false statements under 18 U.S.C. § 1001, 18 U.S.C. § 1621, and 18 U.S.C. § 1623 (five years imprisonment and/or fines). I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on:

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
Signature



FINANCIAL STATEMENT OF CORPORATE DEFENDANT

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**Instructions:**

1. Complete all items. Enter "None" or "N/A" ("Not Applicable") where appropriate. If you cannot fully answer a question, explain why.
2. In completing this financial statement, "the corporation" refers not only to this corporation but also to each of its predecessors that are not named defendants in this action.
3. When an Item asks for information about assets or liabilities "held by the corporation," include ALL such assets and liabilities, located within the United States or elsewhere, held by the corporation or held by others for the benefit of the corporation.
4. Attach continuation pages as needed. On the financial statement, state next to the Item number that the Item is being continued. On the continuation page(s), identify the Item number being continued.
5. Type or print legibly.
6. An officer of the corporation must sign and date the completed financial statement on the last page and initial each page in the space provided in the lower right corner.

**Penalty for False Information:**

Federal law provides that any person may be imprisoned for not more than five years, fined, or both, if such person:

- (1) "in any matter within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies, conceals or covers up by any trick, scheme, or device a material fact, or makes any false, fictitious or fraudulent statements or representations, or makes or uses any false writing or document knowing the same to contain any false, fictitious or fraudulent statement or entry" (18 U.S.C. § 1001);
- (2) "in any . . . statement under penalty of perjury as permitted under section 1746 of title 28, United States Code, willfully subscribes as true any material matter which he does not believe to be true" (18 U.S.C. § 1621); or
- (3) "in any (. . . statement under penalty of perjury as permitted under section 1746 of title 28, United States Code) in any proceeding before or ancillary to any court or grand jury of the United States knowingly makes any false material declaration or makes or uses any other information . . . knowing the same to contain any false material declaration." (18 U.S.C. § 1623)

For a felony conviction under the provisions cited above, federal law provides that the fine may be not more than the greater of (i) \$250,000 for an individual or \$500,000 for a corporation, or (ii) if the felony results in pecuniary gain to any person or pecuniary loss to any person other than the defendant, the greater of twice the gross gain or twice the gross loss. 18 U.S.C. § 3571.

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**BACKGROUND INFORMATION**

**Item 1.      General Information**

Corporation's Full Name \_\_\_\_\_

Primary Business Address \_\_\_\_\_ From (Date) \_\_\_\_\_

Telephone No. \_\_\_\_\_ Fax No. \_\_\_\_\_

E-Mail Address \_\_\_\_\_ Internet Home Page \_\_\_\_\_

All other current addresses & previous addresses for past five years, including post office boxes and mail drops:

Address \_\_\_\_\_ From/Until \_\_\_\_\_

Address \_\_\_\_\_ From/Until \_\_\_\_\_

Address \_\_\_\_\_ From/Until \_\_\_\_\_

All predecessor companies for past five years:

Name & Address \_\_\_\_\_ From/Until \_\_\_\_\_

Name & Address \_\_\_\_\_ From/Until \_\_\_\_\_

Name & Address \_\_\_\_\_ From/Until \_\_\_\_\_

**Item 2.      Legal Information**

Federal Taxpayer ID No. \_\_\_\_\_ State & Date of Incorporation \_\_\_\_\_

State Tax ID No. \_\_\_\_\_ State \_\_\_\_\_ Profit or Not For Profit \_\_\_\_\_

Corporation's Present Status: Active \_\_\_\_\_ Inactive \_\_\_\_\_ Dissolved \_\_\_\_\_

If Dissolved: Date dissolved \_\_\_\_\_ By Whom \_\_\_\_\_

Reasons \_\_\_\_\_

Fiscal Year-End (Mo./Day) \_\_\_\_\_ Corporation's Business Activities \_\_\_\_\_

**Item 3.      Registered Agent**

Name of Registered Agent \_\_\_\_\_

Address \_\_\_\_\_ Telephone No. \_\_\_\_\_

**Item 4. Principal Stockholders**

List all persons and entities that own at least 5% of the corporation's stock.

Name & Address

% Owned


**Item 5. Board Members**

List all members of the corporation's Board of Directors.

Name & Address

% Owned

Term (From/Until)


**Item 6. Officers**

List all of the corporation's officers, including *de facto* officers (individuals with significant management responsibility whose titles do not reflect the nature of their positions).

Name & Address

% Owned


**Item 7. Businesses Related to the Corporation**

List all corporations, partnerships, and other business entities in which this corporation has an ownership interest.

<u>Name &amp; Address</u>	<u>Business Activities</u>	<u>% Owned</u>

State which of these businesses, if any, has ever transacted business with the corporation \_\_\_\_\_

**Item 8. Businesses Related to Individuals**

List all corporations, partnerships, and other business entities in which the corporation's principal stockholders, board members, or officers (i.e., the individuals listed in Items 4 - 6 above) have an ownership interest.

<u>Individual's Name</u>	<u>Business Name &amp; Address</u>	<u>Business Activities</u>	<u>% Owned</u>

State which of these businesses, if any, have ever transacted business with the corporation \_\_\_\_\_

**Item 9. Related Individuals**

List all related individuals with whom the corporation has had any business transactions during the three previous fiscal years and current fiscal year-to-date. A "related individual" is a spouse, sibling, parent, or child of the principal stockholders, board members, and officers (i.e., the individuals listed in Items 4 - 6 above).

<u>Name and Address</u>	<u>Relationship</u>	<u>Business Activities</u>

**Item 10. Outside Accountants**

List all outside accountants retained by the corporation during the last three years.

<u>Name</u>	<u>Firm Name</u>	<u>Address</u>	<u>CPA/PA?</u>

**Item 11. Corporation's Recordkeeping**

List all individuals within the corporation with responsibility for keeping the corporation's financial books and records for the last three years.

<u>Name, Address, &amp; Telephone Number</u>	<u>Position(s) Held</u>

**Item 12. Attorneys**

List all attorneys retained by the corporation during the last three years.

<u>Name</u>	<u>Firm Name</u>	<u>Address</u>

**Item 13. Pending Lawsuits Filed by the Corporation**

List all pending lawsuits that have been filed by the corporation in court or before an administrative agency. (List lawsuits that resulted in final judgments or settlements in favor of the corporation in Item 25).

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_

Docket No. \_\_\_\_\_ Relief Requested \_\_\_\_\_ Nature of Lawsuit \_\_\_\_\_

\_\_\_\_\_ Status \_\_\_\_\_

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_

Docket No. \_\_\_\_\_ Relief Requested \_\_\_\_\_ Nature of Lawsuit \_\_\_\_\_

\_\_\_\_\_ Status \_\_\_\_\_

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_

Docket No. \_\_\_\_\_ Relief Requested \_\_\_\_\_ Nature of Lawsuit \_\_\_\_\_

\_\_\_\_\_ Status \_\_\_\_\_

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_

Docket No. \_\_\_\_\_ Relief Requested \_\_\_\_\_ Nature of Lawsuit \_\_\_\_\_

\_\_\_\_\_ Status \_\_\_\_\_

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_

Docket No. \_\_\_\_\_ Relief Requested \_\_\_\_\_ Nature of Lawsuit \_\_\_\_\_

\_\_\_\_\_ Status \_\_\_\_\_

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_

Docket No. \_\_\_\_\_ Relief Requested \_\_\_\_\_ Nature of Lawsuit \_\_\_\_\_

\_\_\_\_\_ Status \_\_\_\_\_

**Item 14. Current Lawsuits Filed Against the Corporation**

List all pending lawsuits that have been filed against the corporation in court or before an administrative agency. (List lawsuits that resulted in final judgments, settlements, or orders in Items 26 - 27).

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_

Docket No. \_\_\_\_\_ Relief Requested \_\_\_\_\_ Nature of Lawsuit \_\_\_\_\_

\_\_\_\_\_ Status \_\_\_\_\_

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_

Docket No. \_\_\_\_\_ Relief Requested \_\_\_\_\_ Nature of Lawsuit \_\_\_\_\_

\_\_\_\_\_ Status \_\_\_\_\_

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_

Docket No. \_\_\_\_\_ Relief Requested \_\_\_\_\_ Nature of Lawsuit \_\_\_\_\_

\_\_\_\_\_ Status \_\_\_\_\_

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_

Docket No. \_\_\_\_\_ Relief Requested \_\_\_\_\_ Nature of Lawsuit \_\_\_\_\_

\_\_\_\_\_ Status \_\_\_\_\_

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_

Docket No. \_\_\_\_\_ Relief Requested \_\_\_\_\_ Nature of Lawsuit \_\_\_\_\_

\_\_\_\_\_ Status \_\_\_\_\_

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_

Docket No. \_\_\_\_\_ Relief Requested \_\_\_\_\_ Nature of Lawsuit \_\_\_\_\_

\_\_\_\_\_ Status \_\_\_\_\_



**Item 15. Bankruptcy Information**

List all state insolvency and federal bankruptcy proceedings involving the corporation.

Commencement Date \_\_\_\_\_ Termination Date \_\_\_\_\_ Docket No. \_\_\_\_\_

If State Court: Court & County \_\_\_\_\_ If Federal Court: District \_\_\_\_\_

Disposition \_\_\_\_\_

**Item 16. Safe Deposit Boxes**

List all safe deposit boxes, located within the United States or elsewhere, held by the corporation, or held by others for the benefit of the corporation. *On a separate page, describe the contents of each box.*

<u>Owner's Name</u>	<u>Name &amp; Address of Depository Institution</u>	<u>Box No.</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

**FINANCIAL INFORMATION**

**REMINDER:** When an Item asks for information about assets or liabilities "held by the corporation," include **ALL** such assets and liabilities, located within the United States or elsewhere, held by the corporation or held by others for the benefit of the corporation.

**Item 17. Tax Returns**

List all federal and state corporate tax returns filed for the last three complete fiscal years. *Attach copies of all returns.*

<u>Federal/ State/Both</u>	<u>Tax Year</u>	<u>Tax Due Federal</u>	<u>Tax Paid Federal</u>	<u>Tax Due State</u>	<u>Tax Paid State</u>	<u>Preparer's Name</u>
_____	_____	\$ _____	\$ _____	\$ _____	\$ _____	_____
_____	_____	\$ _____	\$ _____	\$ _____	\$ _____	_____
_____	_____	\$ _____	\$ _____	\$ _____	\$ _____	_____

**Item 18. Financial Statements**

List all financial statements that were prepared for the corporation's last three complete fiscal years and for the current fiscal year-to-date. *Attach copies of all statements, providing audited statements if available.*

<u>Year</u>	<u>Balance Sheet</u>	<u>Profit &amp; Loss Statement</u>	<u>Cash Flow Statement</u>	<u>Changes in Owner's Equity</u>	<u>Audited?</u>

**Item 19. Financial Summary**

For each of the last three complete fiscal years and for the current fiscal year-to-date for which the corporation has not provided a profit and loss statement in accordance with Item 17 above, provide the following summary financial information.

	<u>Current Year-to-Date</u>	<u>1 Year Ago</u>	<u>2 Years Ago</u>	<u>3 Years Ago</u>
<u>Gross Revenue</u>	\$ _____	\$ _____	\$ _____	\$ _____
<u>Expenses</u>	\$ _____	\$ _____	\$ _____	\$ _____
<u>Net Profit After Taxes</u>	\$ _____	\$ _____	\$ _____	\$ _____
<u>Payables</u>	\$ _____			
<u>Receivables</u>	\$ _____			

**Item 20. Cash, Bank, and Money Market Accounts**

List cash and all bank and money market accounts, including but not limited to, checking accounts, savings accounts, and certificates of deposit, held by the corporation. The term "cash" includes currency and uncashed checks.

Cash on Hand \$ \_\_\_\_\_ Cash Held for the Corporation's Benefit \$ \_\_\_\_\_

<u>Name &amp; Address of Financial Institution</u>	<u>Signator(s) on Account</u>	<u>Account No.</u>	<u>Current Balance</u>
			\$ _____
			\$ _____
			\$ _____
			\$ _____

**Item 21. Government Obligations and Publicly Traded Securities**

List all U.S. Government obligations, including but not limited to, savings bonds, treasury bills, or treasury notes, held by the corporation. Also list all publicly traded securities, including but not limited to, stocks, stock options, registered and bearer bonds, state and municipal bonds, and mutual funds, held by the corporation.

Issuer \_\_\_\_\_ Type of Security/Obligation \_\_\_\_\_

No. of Units Owned \_\_\_\_\_ Current Fair Market Value \$ \_\_\_\_\_ Maturity Date \_\_\_\_\_

Issuer \_\_\_\_\_ Type of Security/Obligation \_\_\_\_\_

No. of Units Owned \_\_\_\_\_ Current Fair Market Value \$ \_\_\_\_\_ Maturity Date \_\_\_\_\_

**Item 22. Real Estate**

List all real estate, including leaseholds in excess of five years, held by the corporation.

Type of Property \_\_\_\_\_ Property's Location \_\_\_\_\_

Name(s) on Title and Ownership Percentages \_\_\_\_\_

Current Value \$ \_\_\_\_\_ Loan or Account No. \_\_\_\_\_

Lender's Name and Address \_\_\_\_\_

Current Balance On First Mortgage \$ \_\_\_\_\_ Monthly Payment \$ \_\_\_\_\_

Other Loan(s) (describe) \_\_\_\_\_ Current Balance \$ \_\_\_\_\_

Monthly Payment \$ \_\_\_\_\_ Rental Unit? \_\_\_\_\_ Monthly Rent Received \$ \_\_\_\_\_

Type of Property \_\_\_\_\_ Property's Location \_\_\_\_\_

Name(s) on Title and Ownership Percentages \_\_\_\_\_

Current Value \$ \_\_\_\_\_ Loan or Account No. \_\_\_\_\_

Lender's Name and Address \_\_\_\_\_

Current Balance On First Mortgage \$ \_\_\_\_\_ Monthly Payment \$ \_\_\_\_\_

Other Loan(s) (describe) \_\_\_\_\_ Current Balance \$ \_\_\_\_\_

Monthly Payment \$ \_\_\_\_\_ Rental Unit? \_\_\_\_\_ Monthly Rent Received \$ \_\_\_\_\_

**Item 23. Other Assets**

List all other property, by category, with an estimated value of \$2,500 or more, held by the corporation, including but not limited to, inventory, machinery, equipment, furniture, vehicles, customer lists, computer software, patents, and other intellectual property.

<u>Property Category</u>	<u>Property Location</u>	<u>Acquisition Cost</u>	<u>Current Value</u>
		\$ _____	\$ _____
		\$ _____	\$ _____
		\$ _____	\$ _____
		\$ _____	\$ _____
		\$ _____	\$ _____
		\$ _____	\$ _____
		\$ _____	\$ _____
		\$ _____	\$ _____
		\$ _____	\$ _____
		\$ _____	\$ _____

**Item 24. Trusts and Escrows**

List all persons and other entities holding funds or other assets that are in escrow or in trust for the corporation.

<u>Trustee or Escrow Agent's Name &amp; Address</u>	<u>Description and Location of Assets</u>	<u>Present Market Value of Assets</u>
		\$ _____
		\$ _____
		\$ _____
		\$ _____
		\$ _____
		\$ _____
		\$ _____

**Item 25. Monetary Judgments and Settlements Owed To the Corporation**

List all monetary judgments and settlements, recorded and unrecorded, owed to the corporation.

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_ Docket No. \_\_\_\_\_

Nature of Lawsuit \_\_\_\_\_ Date of Judgment \_\_\_\_\_ Amount \$ \_\_\_\_\_

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_ Docket No. \_\_\_\_\_

Nature of Lawsuit \_\_\_\_\_ Date of Judgment \_\_\_\_\_ Amount \$ \_\_\_\_\_

**Item 26. Monetary Judgments and Settlements Owed By the Corporation**

List all monetary judgments and settlements, recorded and unrecorded, owed by the corporation.

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_ Docket No. \_\_\_\_\_

Nature of Lawsuit \_\_\_\_\_ Date \_\_\_\_\_ Amount \$ \_\_\_\_\_

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_ Docket No. \_\_\_\_\_

Nature of Lawsuit \_\_\_\_\_ Date of Judgment \_\_\_\_\_ Amount \$ \_\_\_\_\_

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_ Docket No. \_\_\_\_\_

Nature of Lawsuit \_\_\_\_\_ Date of Judgment \_\_\_\_\_ Amount \$ \_\_\_\_\_

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_ Docket No. \_\_\_\_\_

Nature of Lawsuit \_\_\_\_\_ Date of Judgment \_\_\_\_\_ Amount \$ \_\_\_\_\_

Opposing Party's Name & Address \_\_\_\_\_

Court's Name & Address \_\_\_\_\_ Docket No. \_\_\_\_\_

Nature of Lawsuit \_\_\_\_\_ Date of Judgment \_\_\_\_\_ Amount \$ \_\_\_\_\_

**Item 27. Government Orders and Settlements**

List all existing orders and settlements between the corporation and any federal or state government entities.

Name of Agency \_\_\_\_\_ Contact Person \_\_\_\_\_

Address \_\_\_\_\_ Telephone No. \_\_\_\_\_

Agreement Date \_\_\_\_\_ Nature of Agreement \_\_\_\_\_

**Item 28. Credit Cards**

List all of the corporation's credit cards and store charge accounts and the individuals authorized to use them.

Name of Credit Card or StoreNames of Authorized Users and Positions Held


**Item 29. Compensation of Employees**

List all compensation and other benefits received from the corporation by the five most highly compensated employees, independent contractors, and consultants (other than those individuals listed in Items 5 and 6 above), for the two previous fiscal years and current fiscal year-to-date. "Compensation" includes, but is not limited to, salaries, commissions, consulting fees, bonuses, dividends, distributions, royalties, pensions, and profit sharing plans. "Other benefits" include, but are not limited to, loans, loan payments, rent, car payments, and insurance premiums, whether paid directly to the individuals, or paid to others on their behalf.

<u>Name/Position</u>	<u>Current Fiscal Year-to-Date</u>	<u>1 Year Ago</u>	<u>2 Years Ago</u>	<u>Compensation or Type of Benefits</u>
_____	\$ _____	\$ _____	\$ _____	_____
_____	\$ _____	\$ _____	\$ _____	_____
_____	\$ _____	\$ _____	\$ _____	_____
_____	\$ _____	\$ _____	\$ _____	_____
_____	\$ _____	\$ _____	\$ _____	_____

**Item 30. Compensation of Board Members and Officers**

List all compensation and other benefits received from the corporation by each person listed in Items 5 and 6, for the current fiscal year-to-date and the two previous fiscal years. "Compensation" includes, but is not limited to, salaries, commissions, consulting fees, dividends, distributions, royalties, pensions, and profit sharing plans. "Other benefits" include, but are not limited to, loans, loan payments, rent, car payments, and insurance premiums, whether paid directly to the individuals, or paid to others on their behalf.

<u>Name/Position</u>	<u>Current Fiscal Year-to-Date</u>	<u>1 Year Ago</u>	<u>2 Years Ago</u>	<u>Compensation or Type of Benefits</u>
	\$ _____	\$ _____	\$ _____	
	\$ _____	\$ _____	\$ _____	
	\$ _____	\$ _____	\$ _____	
	\$ _____	\$ _____	\$ _____	
	\$ _____	\$ _____	\$ _____	
	\$ _____	\$ _____	\$ _____	
	\$ _____	\$ _____	\$ _____	
	\$ _____	\$ _____	\$ _____	

**Item 31. Transfers of Assets Including Cash and Property**

List all transfers of assets over \$2,500 made by the corporation, other than in the ordinary course of business, during the previous three years, by loan, gift, sale, or other transfer.

<u>Transferee's Name, Address, &amp; Relationship</u>	<u>Property Transferred</u>	<u>Aggregate Value</u>	<u>Transfer Date</u>	<u>Type of Transfer (e.g., Loan, Gift)</u>
		\$ _____		
		\$ _____		
		\$ _____		
		\$ _____		
		\$ _____		

**Item 32. Documents Attached to the Financial Statement**

List all documents that are being submitted with the financial statement.

<u>Item No. Document Relates To</u>	<u>Description of Document</u>
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I am submitting this financial statement with the understanding that it may affect action by the Federal Trade Commission or a federal court. I have used my best efforts to obtain the information requested in this statement. The responses I have provided to the items above are true and contain all the requested facts and information of which I have notice or knowledge. I have provided all requested documents in my custody, possession, or control. I know of the penalties for false statements under 18 U.S.C. § 1001, 18 U.S.C. § 1621, and 18 U.S.C. § 1623 (five years imprisonment and/or fines). I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on:

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Corporate Position